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UNITED STATES DISTRICT COURT

for the

Western District of Washington

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

BY In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

6 Residences, 7 Vehicles, & 13 Persons, as described in
Attachment A

Case No. MJ18-463

Redacted

CREATED TRUE COPY
ATTEST: WILLIAM M. MCCOOL
Clerk, U.S. District Court
Western District of Washington
Emily N. [Signature]
Deputy Clerk

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

6 Residences, 7 Vehicles, & 13 Persons, as described in Attachment A

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B for List of Items to be Seized.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. § 841(a)(1)	distribution and manufacturing of controlled substances
21 U.S.C. § 843(b)	unlawful use of a communication facility, including USPS and UPS
21 U.S.C. § 846	conspiracy to commit these offenses
18 U.S.C. § 1956	money laundering

The application is based on these facts:

See attached affidavit of Inspector Katelyn Mitchell

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

[Signature of Katelyn R. Mitchell]

Applicant's signature

Katelyn R. Mitchell, United States Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/09/2018

City and state: Seattle, Washington

[Signature of Paula L. McCandlis]

Judge's signature

Paula L. McCandlis, U.S. Magistrate Judge

Printed name and title

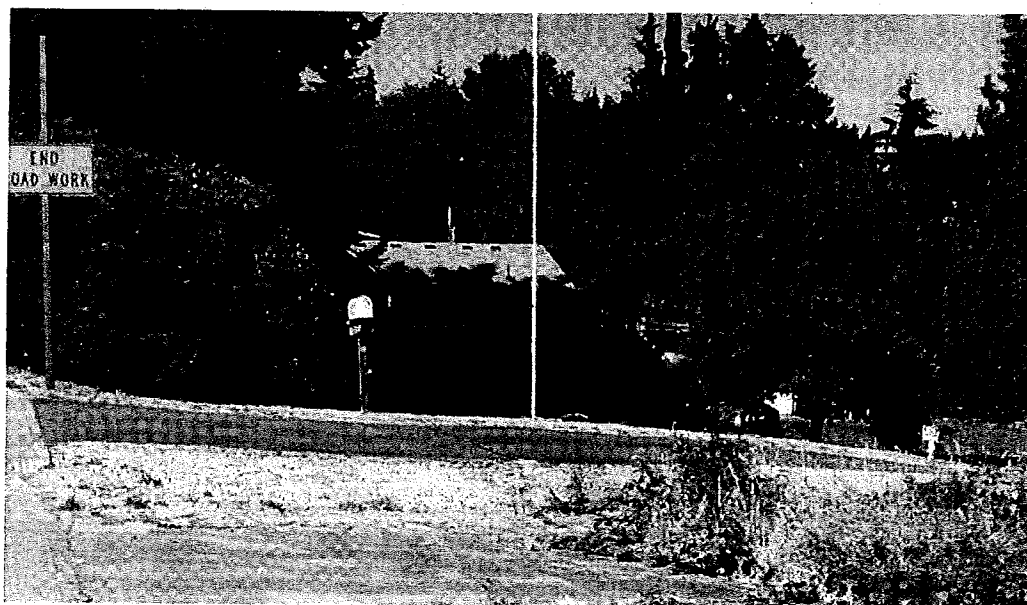
ATTACHMENT A

SUBJECT PREMISES – DESCRIPTION OF ALL PREMISES TO BE SEARCHED

The premises to be searched includes all areas at that location where the Items to Be Seized, listed in Attachment B, could be found. For physical locations, this includes all areas within and surrounding the primary residence/location, including all rooms, attics, crawlspaces, basements, storage areas, containers, surrounding grounds, garages, carports, trash areas/containers, outbuilding, patios, balconies, yards, secure locations (such as safes), vehicles located on or in the premises, and any persons located within said property or within the residence/location described below.

Premises

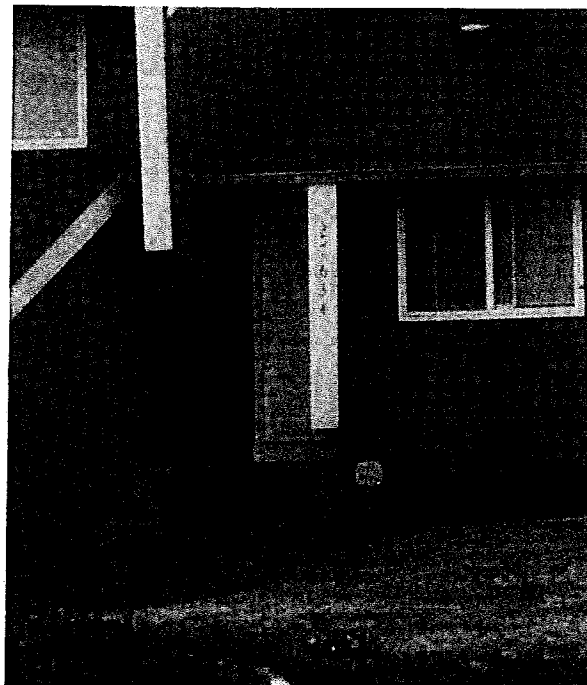
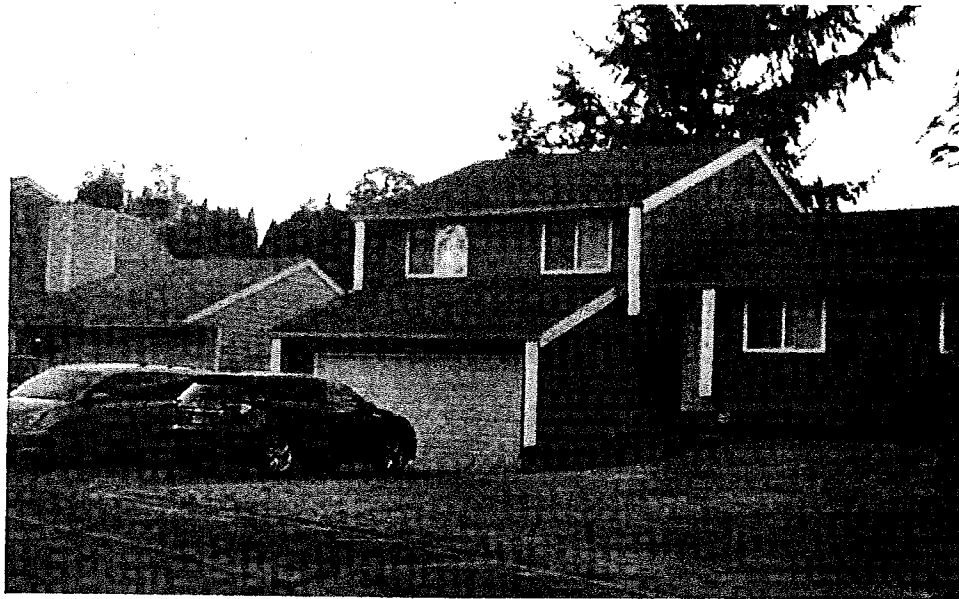
Subject Residence 1 to be searched, 15014 42nd Ave, S., Tukwila, WA 98188, is a single family residence and attached two car garage, located at the address above on 42nd Avenue in Tukwila. **Subject Residence 1** is brick with white trim and the garage appears to be an extension built onto the house. The residence is located down an extensive driveway and the numbers 15014 are affixed to the side of the mailbox at the top of the driveway leading to the residence. The view of the residence from the street is depicted below:



Subject Residence 2 to be searched, 8810 38th Ave. S., Seattle, WA 98118 is a single family residence and attached two car garage, located on 38th Avenue S in Seattle. **Subject Residence 2** is light yellow in color with brown trim and a fenced front yard. The numbers 8810 are affixed to the residence in gray lettering to the left of the front door when facing it. The view of the residence from the street is depicted below:



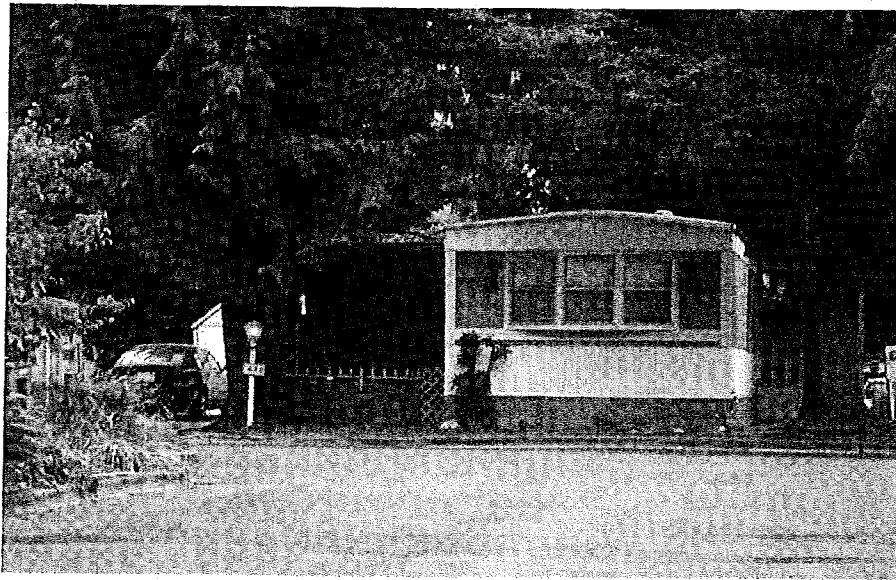
Subject Residence 3 to be searched, 27634 S 123rd Ave SE, Kent, WA 98030 is a single family residence and attached two car garage located on 123rd Avenue SE in Kent. **Subject Residence 3** is gray / lavender in color with white trim and a two car attached garage. The numbers 27634 are affixed to the residence in gold lettering to the right of the front door when facing it. The view of the residence from the street is depicted below:



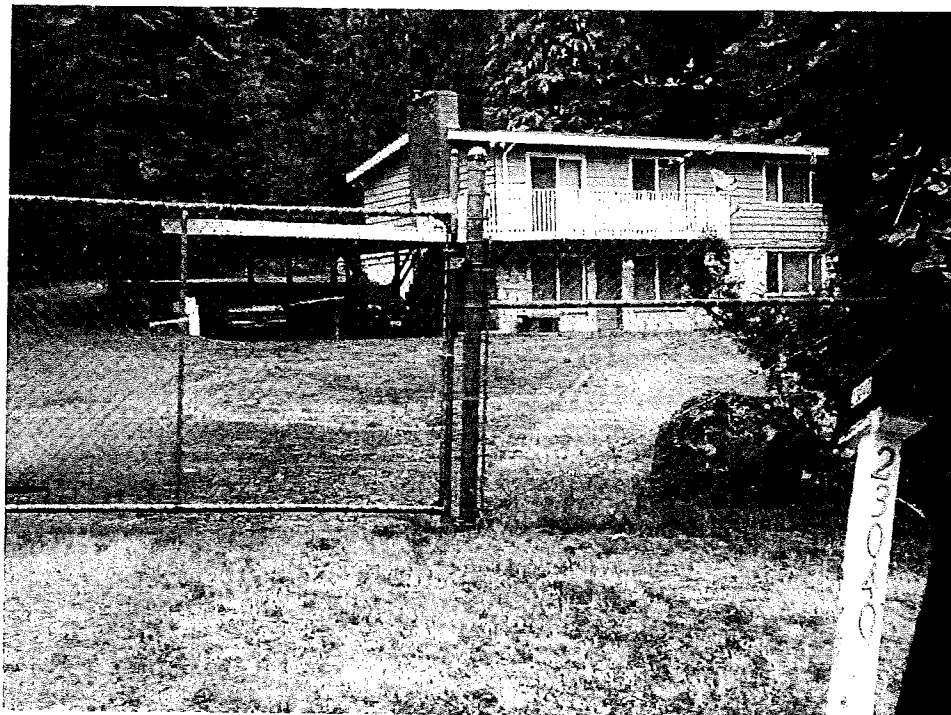
Subject Residence 4 to be searched, 6016 44th Ave. S., Seattle, WA 98118 is a single family residence with a detached rear garage that is no longer accessible from the street due to a fence that has been installed to the right of the residence. **Subject Residence 5** is located on 44th Avenue S. in Seattle, and is yellow in color with white trim and the front of the residence is surrounded by a chain link fence. The numbers 6016 are affixed to the residence in gold lettering on the porch above the front door when facing the residence. The view of the residence from the street is depicted below:



Subject Residence 5 to be searched, 800 29th Street SE #G7, Auburn, WA 98002 is a trailer with a detached shed in the driveway of the property. **Subject Residence 5** is located within Skylark Village Estates Trailer Park in Auburn, WA, and is tan in color with a brown base and brown trim and has a covered porch over the front door of the residence. The trailer number G7 is affixed in black lettering to a small lamp post near the driveway of the residence. The view of the residence from the street within Skylark Village Estates is depicted below:



Subject Residence 6 to be searched, 23040 SE 21st St., Sammamish, WA 98075 is a single family residence with a covered car port. **Subject Residence 6** is located on SE 21st street and is light blue in color with white trim and a bright blue door. The driveway to the residence is blocked by a large chain link fence and gate. The number 23040 are affixed in silver lettering to the mailbox directly in front of the driveway to **Subject Residence 6**. The view of the residence from the street is depicted below:



Persons

For persons to be searched, this includes the named person's clothing and that person's carried items and containers, such as cases, backpacks, and purses.

Anh Nguyen TRAN, DOB [REDACTED] 1989;
Dai Thanh TRAN, DOB [REDACTED] 1992;
Dung Ngoc LU, DOB [REDACTED] 1968;
Hoan Thai TRAN, DOB [REDACTED] 1963;
Hong BUI, DOB [REDACTED] 1946;
Huy HA, DOB [REDACTED] 1965;
Nghia Phuong Chau, DOB [REDACTED] 1961;
Thanh Thao Chi THANH, DOB [REDACTED] 1995;
Truc TRAN, DOB [REDACTED] 1971;
Wilson TRUONG, DOB [REDACTED] 1959;
Zhiyu LIU, DOB [REDACTED] 1969;
Mai Ngoc HUYNH, [REDACTED] 1962;
Minh NGO, [REDACTED] 1962

Vehicles

For vehicles to be searched, this includes all areas of the vehicle, all compartments, and all containers within that vehicle, whether locked or not.

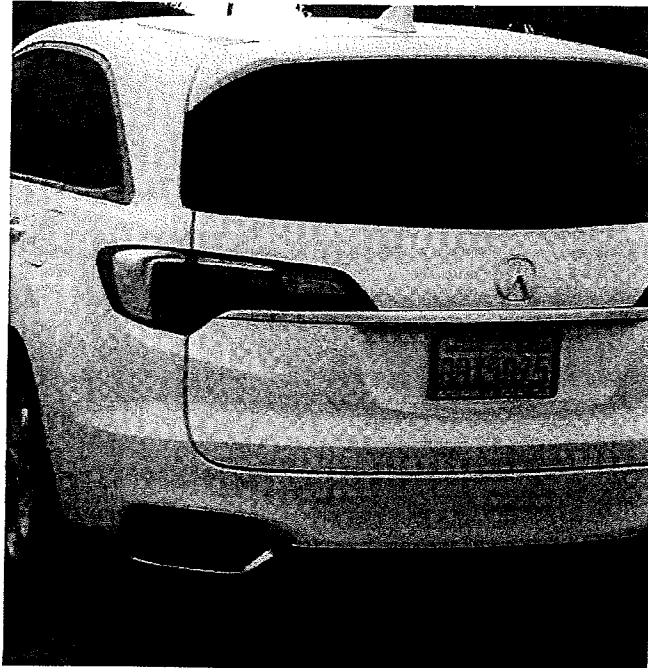
Target Vehicle 1: A 2005 Gray Lexus RX Sport Utility Vehicle (SUV) bearing Washington License Plate: AYZ6802, and Vehicle Identification Number (VIN) JTJHA31U650091606, depicted below:



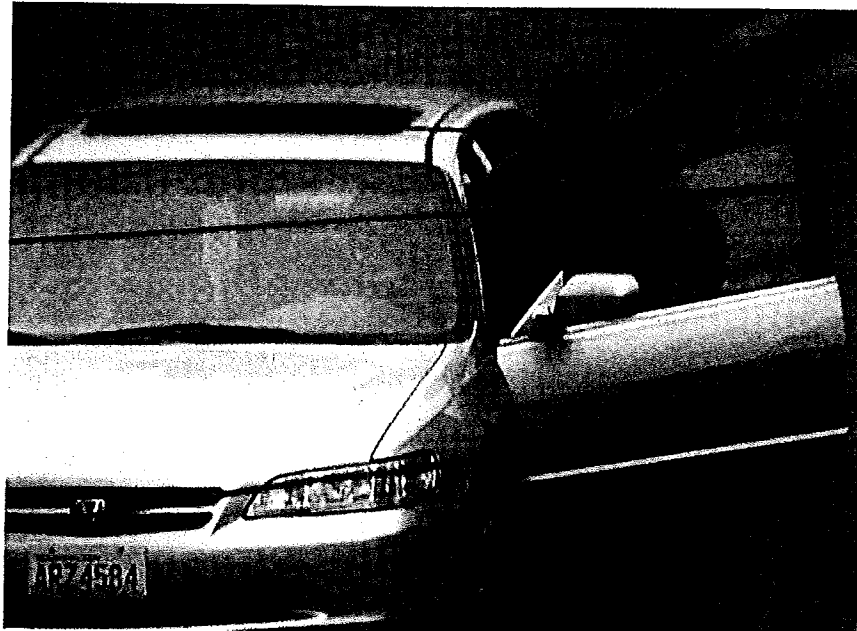
Target Vehicle 2: A 2005 Sea Foam green Honda Odyssey Minivan bearing Washington License Plate: BDR8437, and VIN: 5FNRL38765B078163, depicted below:



Target Vehicle 4: A 2017 White Acura RDX bearing Washington License Plate: BBX5025, and VIN: 5J8TB4H39HL005951, depicted below:



Target Vehicle 5: A 1999 Honda Sedan, gold in color, bearing WA license plate ARZ4584, and VIN: JHMCG565XXC037170, depicted below:



Target Vehicle 6: A 2006 Kia Minivan, white in color, bearing Washington License Plate: BBY3323 and VIN: KNDMB233X66039813, depicted below:



Target Vehicle 7: A 2005 Volvo S60 Sedan, black in color, bearing WA license plate ATY1620 and VIN: YV1RS640952450590, depicted below:



Target Vehicle 8: A 2016 Toyota Rav4, gray in color, bearing Washington License Plate: BHH7506, and VIN JTMDFREVOGD182584, depicted below:



ATTACHMENT B

Items to be Seized

Evidence and/or fruits of the commission of the following crimes: distribution and manufacturing of controlled substances, in violation of 21 U.S.C. § 841(a)(1), unlawful use of a communication facility, including USPS and UPS, to facilitate the distribution of controlled substances, in violation of 21 U.S.C. § 843(b), conspiracy to commit these offenses in violation of 21 U.S.C. § 846, and money laundering, in violation of 18 U.S.C. § 1956, as described below.

1. Any controlled substances, including but not limited to growing and processed marijuana, cocaine, crack cocaine, heroin, hashish, methamphetamine, MDMA, methadone, oxycodone, Oxycontin and fentanyl;
2. Drug Paraphernalia: Items used, or likely to be used, to cultivate, store, process, package, use/consume, and/or distribute controlled substances, such as lights, soil, fertilizer, fans, plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items.
3. Shipping Records and Supplies: USPS, UPS, FedEx, freight companies, and any other packaging materials, including but not limited to boxes and crates, packing tape, shipping labels and invoices, mylar and similar bags, heat and/or vacuum sealing devices, packing peanuts or bubble wrap.
4. Drug Transaction Records: Documents such as ledgers, receipts, notes, invoices, and similar items relating to the acquisition, transportation, and distribution of controlled substances.
5. Customer and Supplier Information: Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, "pay/owe sheets" with drug amounts and prices, maps or directions, and similar items.
6. Currency and Financial Records: U.S. Currency, money orders, gift cards and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; and other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank drafts, cashier's checks, and similar items, and money counters.

7. Photographs/Surveillance: Photographs, video tapes, digital cameras, surveillance cameras and associated hardware/storage devices, and similar items, depicting property occupants, friends and relatives of the property occupants, or suspected growers or buyers or sellers of controlled substances, controlled substances or other contraband, weapons, assets derived from the distribution of controlled substances, and photographs of any documents or other items listed elsewhere in this Attachment.
8. Weapons: Including but not limited to firearms, magazines, ammunition, and body armor.
9. Codes and Passwords: Evidence of codes used in the distribution of controlled substances, including but not limited to passwords for cell phones and bank accounts.
10. Property Records: Deeds, contracts, escrow documents, mortgage documents, rental documents, and other evidence relating to the past, present or future intended purchase, ownership, rental, income, expenses, or control of the premises, and similar records of other properties.
11. Indicia of occupancy, residency, and/or ownership of assets including, but not limited to, utility and telephone bills, canceled envelopes, rental records or payment receipts, leases, mortgage statements, and other documents establishing occupancy.
12. Evidence of Storage Unit Rental or Access: rental and payment records, keys and codes, pamphlets, contracts, contact information, directions, passwords or other documents relating to storage units.
13. Evidence of Personal Property Ownership: Registration information, ownership documents, or other evidence of ownership of property including, but not limited to vehicles, vessels, boats, airplanes, jet skis, all terrain vehicles, RVs, and personal property; evidence of international or domestic travel, hotel/motel stays, and any other evidence of unexplained wealth,
14. Individual and business financial books, records, receipts, notes, ledgers, diaries, journals, and all records relating to income, profit, expenditures, or losses, such as:
 - a. Employment records: paychecks or stubs, lists and accounts of employee payrolls, records of employment tax withholdings and contributions, dividends, stock certificates, and compensation to officers.
 - b. Savings accounts: statements, ledger cards, deposit tickets, register records, wire transfer records, correspondence, and withdrawal slips.
 - c. Checking accounts: statements, canceled checks, deposit tickets, credit/debit documents, wire transfer documents, correspondence, and register records.

- d. Loan Accounts: financial statements and loan applications for all loans applied for, notes, loan repayment records, and mortgage loan records.
- e. Collection accounts: statements and other records.
- f. Certificates of deposit: applications, purchase documents, and statements of accounts.
- g. Credit card accounts: credit cards, monthly statements, and receipts of use.
- h. Receipts and records related to gambling wins and losses, or any other contest winnings.
- i. Insurance: policies, statements, bills, and claim-related documents.
- j. Financial records: profit and loss statements, financial statements, receipts, balance sheets, accounting work papers, any receipts showing purchases made, both business and personal, receipts showing charitable contributions, and income and expense ledgers.

15. All bearer bonds, letters of credit, money drafts, money orders, cashier's checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money wrappers, stored value cards, and other forms of financial remuneration evidencing the obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money.

16. All Western Union and/or Money Gram documents and other documents evidencing domestic or international wire transfers, money orders, official checks, cashier's checks, or other negotiable interests that can be purchased with cash. These documents are to include applications, payment records, money orders, frequent customer cards, etc.

17. Negotiable instruments, jewelry, precious metals, financial instruments, stored value/prepaid cards, receipts for the purchases and expenditures made on stored value/prepaid cards, and other negotiable instruments.

18. Documents reflecting the source, receipt, transfer, control, ownership, and disposition of United States and/or foreign currency.

19. Correspondence, papers, records, and any other items showing employment or lack of employment.

20. Telephone books, and/or address books, facsimile machines to include the carbon roll and/or other memory system, any papers reflecting names, addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-conspirators, sources of supply, customers, financial institutions, and other individuals or businesses with whom a financial relationship exists. Also, telephone answering devices that record telephone

conversations and the tapes therein for messages left for or by co-conspirators for the delivery or purchase of controlled substances or laundering of drug proceeds.

21. Safes and locked storage containers, and the contents thereof which are otherwise described in this document.

22. Tools: Tools that may be used to open hidden compartments in vehicles, paint, bonding agents, magnets, or other items that may be used to open/close compartments.

23. Cell Phones: Cellular telephones and other communications devices may be seized, and searched for the following items:

- a. Assigned number and identifying telephone serial number (ESN, MIN, IMSI, or IMEI);
- b. Stored list of recent received, sent, and missed calls;
- c. Stored contact information;
- d. Stored photographs of controlled substances, currency, firearms or other weapons, controlled substances cultivation, packaging, and/or paraphernalia, evidence of suspected criminal activity, including photographs of documents or other items described above, and/or the user of the phone or suspected co-conspirators, including any embedded GPS data associated with those photographs;
- e. Stored text messages.

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1 transportation and distribution of controlled substances to avoid detection and
2 apprehension by law enforcement officers.

3 2. Because of my personal participation in this investigation and because of
4 information provided to me by other agents and officers, I am familiar with the facts and
5 circumstances of this investigation. My experience in investigating drug offenders, my
6 education, my conversations with senior drug agents, and my specialized training form a
7 basis for my opinions and conclusions set forth below.

8 3. Because this affidavit is being submitted for the limited purpose of
9 obtaining the Warrants described below, I have not included every fact known to me
10 concerning this investigation. Rather, I have set forth only the facts that I believe are
11 necessary to show that there is probable cause to issue the requested warrants. I have
12 obtained the facts set forth in this affidavit through my personal participation in the
13 investigation described below; from oral and written reports of other law enforcement
14 officers and analysts; and from records, documents and other evidence obtained during
15 this investigation. When I refer to registration records for vehicles, I am relying on
16 records obtained from the Washington State Department of Licensing (DOL). Insofar as
17 I have included event times in this affidavit, those event times are approximate. Insofar
18 as I have identified individuals observed by myself or other surveillance agents, those
19 identifications have been made by comparison with reliable identification documents
20 which include photographs, such as Driver's Licenses.

21 4. The financial investigation in this case primarily has been conducted by
22 Becky Carnell. Ms. Carnell is a Financial Auditor employed by the U.S. Attorney's
23 Office, with extensive training and 17 years of experience in conducting financial
24 investigations in complex drug trafficking and money laundering cases. She obtained
25 banking, property, tax, and other financial records relevant to this case, and reviewed
26 those documents. Then she conveyed her factual summary of that voluminous data to
27 me. I have relied on Ms. Carnell's review of the underlying financial records and her
28 summary of those records in most instances where I discuss financial transactions, below.

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a. **PREMISES ASSOCIATED WITH HOAN THAI TRAN and DUNG NGOC LU:**

ii. The person of **Hoan Thai TRAN**.

iv. **Target Vehicle 1:** A 2005 Gray Lexus RX Sport Utility Vehicle (SUV) bearing Washington License Plate: AYZ6802, and Vehicle Identification Number (VIN) JTJHA31U650091606 (herein referred to as “**TV-1**”). According to Washington Department of Licensing (DOL) records, **TV-1** is registered to **Hoan Thai TRAN**, at 15014 42nd Ave S., Tukwila, Washington, 98188, in King County.

b. PREMISES ASSOCIATED WITH TRUC TRAN, HONG BUI, THANH THAO CHI THANH, ANH NGUYEN TRAN, and DAI THANH TRAN:

Affidavit of Inspector Mitchell - 3
USAO No. 2017R00551

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 March 2018 to receive, package and facilitate large shipments of marijuana from the state
2 of Washington to the state of Minnesota. Further, investigators believe that **Subject**
3 **Residence 2** contains evidence of the above individuals' ongoing, current and past
4 criminal conduct.

- 5 ii. The person of **Truc TRAN**.
- 6 iii. The person of **Hong BUI**.
- 7 iv. The person of **Thanh Thao Chi THANH**.
- 8 v. The person of **Anh Nguyen TRAN**.
- 9 vi. The person of **Dai Thanh TRAN**.

10
11 vii. **Target Vehicle 4¹**: A 2017 White Acura RDX bearing
12 Washington License Plate: **BBX5025**, and VIN: 5J8TB4H39HL005951 (herein referred
13 to as "**TV-4**"). According to Washington DOL records, **TV-4** is registered to **Truc**
TRAN at 8336 39th Ave. S., Seattle, WA 98118, in King County.

14 viii. **Target Vehicle 8**: A 2016 Toyota Rav4, gray in color,
15 bearing Washington License Plate: **BHH7506**, and VIN JTMDFREVD0GD182584 (herein
16 referred to as "**TV-8**"). According to Washington DOL records, **TV-8** is registered to
Anh Nguyen TRAN at 8336 39th Ave. S., Seattle, WA 98118, in King County.

17 c. **PREMISES ASSOCIATED WITH WILSON TRUONG AND**
18 **ZHIYU LIU:**

19 i. **Subject Residence 3**: The residence located at **27634 123rd**
20 **Ave. SE, Kent, WA 98030**. As described below, this is believed to be the current
21 residence of **Wilson TRUONG** and **Zhiyu LIU**. Based on power records provided by
22 Puget Sound Energy and regular surveillance and other facts detailed in this affidavit,
23 agents believe that **Subject Residence 3** contains a substantial clandestine marijuana
24 grow operation. Further, investigators believe that **Subject Residence 3** contains
25

26
27 ¹ **Target Vehicles 1-6** have been the subject of judicial tracking warrants; I have retained their Target Vehicle
28 designations from those pleadings for purposes of consistency, although that means they are out of numerical order
in this affidavit.

1 evidence of **Wilson TRUONG** and **Zhiyu LIU**'s ongoing, current and past criminal
2 conduct.

3 ii. The person of **Wilson TRUONG**.

4 iii. The person of **Zhiyu LIU**.

5 iv. **Target Vehicle 2:** A 2005 Sea Foam green Honda Odyssey
6 Minivan bearing Washington License Plate: **BDR8437**, and VIN: 5FNRL38765B078163
7 (herein referred to as "**TV-2**"). According to Washington DOL records, **TV-2** is
8 registered to **Wilson TRUONG**, at 16626 126th Ave. SE, Renton, WA 98058, in King
County.

9 d. **PREMISES ASSOCIATED WITH HUY HA AND NGHI**
10 **PHUONG CHAU:**

11 i. **Subject Residence 4:** The residence located at **6016 44th**
12 **Ave. S., Seattle, WA 98118**. As described below, this is believed to be the current
13 residence of **Huy HA** and **Nghi Phuong CHAU**. Based on power records provided by
14 Seattle City Light and regular surveillance and other facts as detailed in this affidavit,
15 investigators believe that **Subject Residence 4** contains a substantial clandestine
16 marijuana grow operation. Further, investigators believe that **Subject Residence 4**
17 contains evidence of **Huy HA** and **Nghi Phuong CHAU**'s ongoing, current and past
18 criminal conduct.

19 ii. The person of **Huy HA**.

20 iii. The person of **Nghi Phuong CHAU**.

21 iv. **Target Vehicle 5:** A 1999 Honda Sedan, gold in color,
22 bearing WA license plate **ARZ4584**, and VIN: JHMCG565XXC037170 (herein referred
23 to as "**TV-5**"). According to Washington DOL records, **TV-5** is registered to **Huy HA** at
24 18816 113th Way SE Renton, WA 98055, in King County.

1 e. **PREMISES ASSOCIATED WITH MAI NGOC HUYNH and**
2 **MINH NGO:**

3 i. **Subject Residence 5:** The residence located at
4 **800 29th Street SE #G7, Auburn, WA 98002.** As described below, this is believed to be
5 the current residence of **Mai Ngoc HUYNH** and **Minh NGO**. Based on the facts outlined
6 in this affidavit, investigators believe that **Subject Residence 5** may be used to facilitate
7 the packaging and distribution of marijuana and that **Subject Residence 5** contains
8 evidence of **Mai Ngoc HUYNH** and **Minh NGO's** ongoing, current and past criminal
9 conduct.

10 ii. The person of **Mai Ngoc HUYNH**.

11 iii. The person of **Minh NGO**.

12 iv. **Target Vehicle 6:** A 2006 Kia Minivan, white in color,
13 bearing Washington License Plate: BBY3323 and VIN: KNDMB233X66039813, (herein
14 referred to as "**TV-6**"). According to Washington State DOL, **TV-6** is registered to **Mai**
15 **Ngoc HUYNH** at 11402 61st Ave. S., Seattle, WA 98178. Regular surveillance confirms
16 that **TV-6** is parked on a near daily basis at Skylark Village Estates located at 800 29th
Street SE #G7, Auburn, WA 98002.

17 v. **Target Vehicle 7:** A 2005 Volvo S60 Sedan, black in color,
18 bearing WA license plate ATY1620 and VIN: YV1RS640952450590, (herein referred to
19 as "**TV-7**"). According to Washington State DOL, **TV-7** is registered to **Minh NGO** at
800 29th Street SE #G7, Auburn, WA 98002.

20 vi. **Subject Residence 6:** The residence located at **23040 SE 21st**
21 **St., Sammamish, WA 98075.** Based on power records provided by Puget Sound Energy
22 and regular surveillance and other facts as detailed in this affidavit, investigators believe
23 that **Subject Residence 6** contains a substantial clandestine marijuana grow operation.
24 Further, investigators believe that **Subject Residence 6** contains evidence of **Mai Ngoc**
25 **HUYNH** and **Minh NGO's** ongoing, current and past criminal conduct.

26 6. Based upon the facts set forth below, there is probable cause to believe that
27 **THE SUBJECT PREMISES**, including the persons listed above, are presently
28

1 committing or being used in the Western District of Washington in furtherance of the
2 following federal criminal offenses, and that evidence of those offenses, as described in
3 Attachment B (Items to be Seized), hereby fully incorporated into this affidavit, will be
4 located therein: distribution and manufacturing of controlled substances, in violation of
5 21 U.S.C. § 841(a)(1), unlawful use of a communication facility, including USPS and
6 UPS, to facilitate the distribution of controlled substances, in violation of 21 U.S.C. §
7 843(b), conspiracy to commit these offenses in violation of 21 U.S.C. § 846, and money
8 laundering, in violation of 18 U.S.C. § 1956, and related offenses.

9 7. Further, there is probable cause to believe that **Hoan Thai TRAN, Dung**
10 **Ngoc LU, Truc TRAN, Hung HONG, Hong BUI, Thanh Thao Chi THANH, Anh**
11 **Nguyen TRAN, Dai Thanh TRAN, Wilson TRUONG, Zhiyu LIU, Huy HA, Nghi**
12 **Phuong CHAU, Mai Ngoc HUYNH, Minh NGO, Kiet TRAN** and others known and
13 unknown are committing the crimes listed above, and that a search of their persons and
14 any carried personal containers, such as a purse, wallet, backpack or briefcase, will lead
15 to evidence, fruits, and instrumentalities of the aforementioned crimes, as described in
16 Attachment B, as well as to the identification of other individuals who are engaged in the
17 commission of those and related crimes. While I believe there is probable cause to arrest
18 the individuals named above, for operational reasons we do not plan to make arrests at
19 the time the search warrants are executed. Therefore, regardless of their location at the
20 time of execution, as long as it is within the Western District of Washington, I seek
21 authorization to search the persons of the individuals listed in bold, above, and any
22 carried personal containers, such as a purse, wallet, backpack, or briefcase, for items
23 specified in Attachment B.

24 **III. SUMMARY OF INVESTIGATION**

25 8. Since August 2016, USPIS, the Drug Enforcement Administration (DEA),
26 and USPS Office of Inspector General (OIG), in cooperation with Seattle Police
27 Department (SPD) and King County Sheriff's Department (KCSO), have been
28 investigating several illegal and unlicensed clandestine marijuana grow operations in the

greater Seattle, Washington area. Through this investigation, there is probable cause to believe, based on surveillance and seizures conducted by law enforcement officers, and the review of USPS and financial records, that **Hoan Thai TRAN, Dung Ngoc LU, Truc TRAN, Hung HONG, Hong BUI, Thanh Thao Chi THANH, Anh Nguyen TRAN, Dai Thanh TRAN Wilson TRUONG, Zhiyu LIU, Huy HA, Nghi Phuong CHAU, Mai Ngoc HUYNH, Minh NGO**, and Kiet TRAN as well as known and unknown associates are now or have been previously engaged in operating illegal marijuana grow operations in Western Washington. There is also probable cause to believe that **Hoan Thai TRAN, Truc TRAN, Thanh Thao Chi THANH, and Huy HA**, and other conspirators known and unknown, are transporting marijuana out of state for re-distribution using the United States Postal Service and other carriers including United Parcel Service (UPS), and using the United States Postal Service and other means to launder the proceeds of this criminal activity. To date, as described further below, this investigation has identified multiple local individuals involved in the in-state cultivation and out-of-state distribution operation. It has also led to the seizure of several outbound packages that contained significant quantities of marijuana, as well as the search of twenty inbound packages that contained what appears to be payment for the outgoing marijuana and/or marijuana packaging materials.

9. According to the Washington State Liquor and Cannabis Board (WSLCB), no individual(s) by the name(s) of: **Hoan Thai TRAN, Dung Ngoc LU, Truc TRAN, Hung HONG, Hong BUI, Thanh Thao Chi THANH, Anh Nguyen TRAN, Dai Thanh TRAN, Wilson TRUONG, Zhiyu LIU, Huy HA, Nghi Phuong CHAU, Mai Ngoc HUYNH or Minh Ngo** are licensed to produce or sell marijuana in the state of Washington. I also conducted a search of WSLCB records for all of the **Subject Residences** and confirmed that none are licensed to produce or sell marijuana. Manufacturing without a license and transporting marijuana out of state are also violations of the Washington State Uniform Controlled Substances Act, in addition to being crimes under federal law.

IV. DETAILS OF INVESTIGATION

A. Hoan Thai TRAN Identified - Marijuana Grow at 46th Ave. S. in Seattle, WA

10. On August 23, 2016, the Seattle Police Department (SPD) executed a search warrant at a residence located at 7701 46th Avenue South, Seattle, WA 98118. SPD seized approximately 156 marijuana plants, harvested marijuana, and materials commonly associated with marijuana grow operations, such as fertilizer and scales from the residence. SPD identified three individuals, Binh Thanh VO, Diana Mung TRAN, and **Hoan Thai TRAN**, inside the residence. During the search warrant execution, **Hoan Thai TRAN** consented to the search of his registered vehicle, **TV-1**, which was parked outside the residence at 7701 46th Avenue South, Seattle, WA. Inside **TV-1**, officers found a USPS Letter Carrier uniform. **Hoan Thai TRAN** also consented to a search of his cellular phone, which contained multiple photos of marijuana plants, parcel tracking numbers, banking information, photos of identification belonging to other individuals, and recently mailed parcels.

11. Using USPS databases, I later confirmed that **Hoan Thai TRAN** is employed by USPS as a Letter Carrier at the Issaquah Post Office located at 400 NW Gilman Blvd, Issaquah, WA 98027. According to USPS business records, **Hoan Thai TRAN** lists his residential address as 7433 48th Ave. S., Seattle, WA 98118. Service associated with **Hoan Thai TRAN**'s cellular phone number identified during the search warrant was terminated days after the execution of the search warrant at 7701 46th Ave. South, Seattle, WA 98118. Through my training and experience I know it is common for individuals engaged in drug trafficking to use cell phones to communicate with co-conspirators, manage clandestine marijuana grow operations, arrange the transport of and/or payment for drugs purchased.

12. Also discovered within the residence at 7701 46th Avenue South was evidence of marijuana being shipped out of state through the United States Postal Service (USPS). A ledger recovered during the search contained a number of out of state

1 addresses including "Nicole Smith, 1715 Eubanks Street, Newport, AR 72112." A
2 receipt bearing USPS tracking number 9505 5148 7912 6235 0214 09 was also recovered
3 during the search, for a parcel mailed to the same address in Arkansas, on August 22,
4 2016.

5 **B. Parcel Search Warrants Associated with Evidence Recovered at 46th Avenue**

6 13. On August 24, 2016, postal inspectors intercepted the parcel addressed to
7 "Nicole Smith" bearing USPS tracking number 9505 5148 7912 6235 0214 09. I applied
8 for and obtained a Federal search warrant for the parcel and discovered 2,765.2 grams of
9 green leafy substance, packaged in six heat-sealed, vacuum-sealed plastic bags. The
10 substance was field tested and tested positive for marijuana/Tetrahydrocannabinol (THC).

11 14. On November 9, 2016, postal inspectors intercepted a Priority Mail parcel
12 bearing USPS tracking number 9505 5148 7912 6312 0530 57, destined for "8300
13 Dupont Avenue North, Minneapolis, MN 55444." This address was previously identified
14 on both **Hoan Thai TRAN**'s cellular phone and the ledger at 7701 46th Avenue South. I
15 applied for and obtained a Federal search warrant for this parcel, which was executed on
16 November 10, 2016. The parcel was found to contain 2,492 grams of green leafy
17 substance, packaged in six vacuum-sealed plastic bags. This suspected marijuana has
18 been submitted to the Seattle Police Department laboratory for testing. Based on my
19 training and personal familiarity with the appearance of marijuana, I believe the contents
20 of this parcel to be harvested marijuana.

21 **C. Surveillance of Hoan Thai TRAN at Subject Residence 1, 15015 42nd Ave. S.,**
22 **Tukwila, WA 98188**

23 15. Since February 2017 and as recently as July 24, 2018, based on regular
24 physical surveillance of **Hoan Thai TRAN** as well as data produced by a judicially
25 authorized GPS tracking device affixed to **TV-1**, investigators have determined that he
26 and his wife, **Dung Ngoc LU**, reside currently at 15014 42nd Ave S, Tukwila, WA
27 98188, referred to herein as **Subject Residence 1**. According to data produced by the
28 same GPS tracking device affixed to **TV-1**, **Hoan Thai TRAN** departs from **Subject**

1 **Residence 1** on a near-daily basis to travel to his place of employment, the Issaquah Post
2 Office located at 400 NW Gilman Blvd, Issaquah, WA 98027 and returns to **Subject**
3 **Residence 1** practically every evening, where **TV-1** remains parked overnight. Property
4 records indicate that **Hoan Thai TRAN** purchased **Subject Residence 1** for \$171,000 on
5 June 18, 2014; no loans were obtained at the time of purchase to finance this transaction.
6 Financial records indicate that two accounts associated with "Rainier Valley Family
7 LLC," a business that investigators believe to be fictitious and owned by **Hoan Thai**
8 **TRAN** and his sister Tamie HARRIS, funded \$105,000 toward the purchase of **Subject**
9 **Residence 1**. Financial records also indicate that cash deposits to accounts maintained by
10 **Dung Ngoc LU** and **Hoan Thai TRAN** funded more than \$65,000 toward the same
11 purchase. On September 15, 2014, **Hoan Thai TRAN** quit claimed **Subject Residence 1**
12 to Linh H NGUYEN. On February 11, 2015, **Dung Ngoc LU** quit claimed her interest to
13 **Hoan T TRAN**. According to the quit claim deed, **Dung Ngoc LU** was the spouse of the
14 grantee, **Hoan Thai TRAN**. On April 24, 2018, Linh H NGUYEN quit-claimed his
15 interest in **Subject Residence 1** to his mother, Tamie HARRIS, who according to law
16 enforcement databases is the sister of **Hoan Thai TRAN** and an officer of Rainier Valley
17 Family LLC and other suspect businesses and LLCs associated with Tamie HARRIS and
18 **Hoan Thai TRAN**. The note on the quit-claim deed reads "Gift to my mom."

19 16. On July 19, 2017, at approximately 1:00 AM, DEA Special Agent Joseph
20 Pelz, Inspector Mitchell and U.S. Postal Service Office of Inspector General (USPS OIG)
21 Special Agent Snyder conducted battery maintenance service on the GPS tracker affixed
22 to **TV-1** at **Subject Residence 1**. While walking along the northern edge of the residence,
23 SA Pelz, SA Snyder and Inspector Mitchell identified and reported the odor of marijuana
24 emitting from the residence. Agents also observed a large commercial air conditioning
25 unit as well as six large plastic water containers or barrels concealed under tree cover.
26 Further, windows and doors on the north and west sides of the residence were covered
27 with curtains or boards. Agents could hear the sound of fans running inside this part of
28 the residence. I know through my training and experience, and through my observations

1 at other search warrant locations associated with this investigation, that these
2 characteristics are consistent with an active clandestine marijuana grow operation. Agents
3 then conducted the battery exchange on **TV-1** and exited the property.

4 17. On January 12, 2018, at approximately 1:22 PM, DEA Task Force Officer
5 (TFO) Michael Klokow and I were conducting surveillance at **Subject Residence 1**,
6 where we observed a Honda Odyssey minivan bearing WA license plate BDR8437
7 registered to **Wilson TRUONG** at 16626 126th Ave SE Renton, WA 98058, hereafter
8 referred to as **TV-2**, parked in the driveway and backed up to the garage door. At
9 approximately 2:11 PM, **Hoan Thai TRAN** arrived home to **Subject Residence 1** in **TV-**
10 **1** and parked in the driveway next to **TV-2**. At approximately 2:23 PM, TFO Klokow
11 walked past the residence on foot and reported the odor of marijuana emanating from the
12 direction of **Subject Residence 1**. At approximately 2:28 PM, TFO Klokow again
13 reported the odor of growing marijuana plants as he walked around the corner of 42nd
14 Ave. S. and 150th street, exposing the back side of **Hoan Thai TRAN's** residence and
15 garage. TFO Klokow also reported that all of the windows in the back of the residence
16 were covered with paper and cardboard.

17 18. Investigators have not since detected the odor of marijuana emanating from
18 **Subject Residence 1** and power records obtained from Seattle City Light (SCL) do not
19 currently indicate the use of metered electricity consistent with the presence of a
20 clandestine marijuana grow at **Subject Residence 1**; however, I know through my
21 training and experience that it is common for individuals engaged in narcotics trafficking
22 to alter their practices over time and move their marijuana growing operations in an effort
23 to protect themselves and their organization and evade law enforcement detection. I also
24 know that it is common for individuals engaged in trafficking marijuana outside the state
25 of Washington to collect product from multiple other individuals according to demand,
26 rather than attempt to grow and supply shipments on their own. Investigators believe that
27 even if no longer housing a current marijuana grow operation, **Subject Residence 1**, as
28 **Hoan Thai TRAN's** consistent residence for the past 20 months and former grow

location, will contain evidence, as described in Attachment B, of **Hoan Thai TRAN's** long-term and ongoing involvement in distribution and manufacturing of controlled substances, in violation of 21 U.S.C. § 841(a)(1), unlawful use of a communication facility, including USPS and UPS, to facilitate the distribution of controlled substances, in violation of 21 U.S.C. § 843(b), conspiracy to commit these offenses in violation of 21 U.S.C. § 846, and 18 U.S.C. § 1956, money laundering and related offenses.

19. As part of this investigation, I reviewed a summary of financial information from multiple banking institutions where **Hoan Thai TRAN** and **Dung Ngoc LU** maintain bank accounts and credit cards, as well as USPS employment records and Federal Income Tax Returns filed by **Hoan Thai TRAN** and **Dung Ngoc LU**. The following table summarizes total reported wages and compensation with confirmed deposits to accounts maintained by **Hoan Thai TRAN** and **Dung Ngoc LU** between 2014 and 2017 and indicates unexplained cash deposits in comparison with Federal Income Tax Returns:

Year	Wages Reported	Tax Return Income	Total Employment Deposits ²	Total Cash Deposits ³
2014	\$66,412.15	\$59,430	\$40,609.13	\$178,800.00
2015	\$84,879.98	\$60,611	\$49,887.05	\$97,400.00
2016	\$73,902.35	\$71,899	\$47,528.07	\$33,440.00
2017 (partial):	\$63,003.87	\$72,216	\$41,095.04	\$13,399.02

20. A review of all accounts maintained by **Hoan Thai TRAN** and/or his wife **Dung Ngoc LU** shows that during 2014, approximately \$178,800 in cash was deposited to their accounts; this amount is separate and apart from the \$40,609 in USPS payroll deposits for **Hoan Thai TRAN** during the same time period. More than \$65,000 of these cash deposits, were used to purchase **Subject Residence 1** on June 18, 2014.

² The net amount deposited for each of **Hoan Thai TRAN's** paycheck was consisted with the net pay indicated on the USPS payroll records.

1 21. Between December 24, 2013 and May 18, 2018, deposits to **Hoan Thai**
2 **TRAN's** US Bank Account ending in 0846 (set up to receive direct deposit paychecks
3 from USPS) totaled \$366,949.84. Of this amount, \$170,955.14 (47%) consisted of **Hoan**
4 **Thai TRAN's** payroll from USPS. An additional \$24,018.17 (7%) consisted of what
5 appear to be payroll checks for **Dung Ngoc LU**. \$89,420.51 (33%) consisted of cash,
6 \$15,400 (6%) in money orders, and \$20,288 (6%) came from IRS Income Tax Refunds.
7 In total, from 2014 through early 2018, cash deposits to accounts maintained by Tran
8 and/or Lu totaled more than \$323,000.

9 **D. April 25, 2017 Shipment of UPS Parcel**

10 22. On April 25, 2017, investigators conducted surveillance of **Hoan Thai**
11 **TRAN** at **Subject Residence 1**. Investigators observed **Hoan Thai TRAN** depart his
12 residence in **TV-1** and followed **Hoan Thai TRAN** directly to a UPS Store, located at
13 3815 S. Othello Street, Suite 100, Seattle, WA 98118. Investigators observed **Hoan Thai**
14 **TRAN** park **TV-1**, enter the UPS store alone and ship a large cardboard box measuring
15 approximately 18.5" x 18.5" x 18.5." After **Hoan Thai TRAN** departed, I entered the UPS
16 store and obtained the parcel shipped by **Hoan Thai TRAN** (UPS Parcel 1Z 37Y 454 03
17 0043 5416, hereafter referred to as UPS Parcel *5416) pending application for a search
18 warrant. According to the parcel label and UPS shipping records, the return address listed
19 on the parcel was "Annie Lee, 2825 NE Sunset Blvd, Renton, WA 98056" and recipient
20 address was listed as "Steve Lee, 7916 Oregon Avenue North, Brooklyn Park, MN
21 55445," and it weighed approximately 30 pounds.

22 23. On May 1, 2017, investigators executed a Washington State Superior Court
23 search warrant on UPS Parcel *5416 shipped by **Hoan Thai TRAN**. The interior of the
24 cardboard parcel was reinforced by a constructed wooden box which was held together
25 with caulking. Inside the box, investigators discovered 17 packages of green leafy
26 substance, which field tested positive for marijuana/Tetrahydrocannabinol (THC). These
27 17 packages were heat/vacuum sealed and two scented dryer sheets were placed inside to
28

1 further mask the odor of marijuana. Investigators weighed the marijuana which totaled
2 8,390.6 grams.

3 **E. Search Warrants for Parcels sent to 8336 39th and to 8810 38th Ave. S.,**
4 **Seattle, WA 98118, Subject Residence 2.**

5 24. Meanwhile, on April 28, 2017, Postal Inspector Nelson Rivera was
6 conducting an interdiction at the Seattle Processing and Distribution Center in Seattle,
7 and identified USPS Express Mail parcel bearing number EL713132066US. The parcel
8 was addressed to "Lisa Lee," 8336 39th Ave. S., Seattle, WA 98118. The return address
9 on the parcel was listed as "Steve Lee," PO Box 1986, Minnetonka, MN 55345. Both the
10 sender and recipient names were found to be fictitious, as was the listed return address. A
11 narcotics detection canine was applied to the parcel and alerted positively to the presence
12 of narcotics.

13 25. Inspector Rivera applied for and obtained a Federal search warrant for the
14 parcel and found that it contained a sealed, padded flat rate envelope, which – in turn –
15 contained a sealed Tyvek envelope. Inside the Tyvek envelope, Inspector Rivera found
16 hundreds of twenty-dollar bills. The parcel contained no notes, receipts, or instructions to
17 indicate the intended purpose of the currency. In total, the parcel contained \$10,000 in
18 U.S. currency. This currency was seized by USPIS as suspected proceeds of the
19 distribution of controlled substances. Based on the listed fictitious sender, "Steve Lee,"
20 the return address of Minnetonka, MN, a suburb of Minneapolis, as well as the date on
21 which the parcel was shipped, April 27, 2017, Inspectors believe the currency may have
22 been intended as partial payment for the marijuana **Hoan Thai TRAN** mailed on April
23 25, 2017. Although UPS parcel 1Z 37Y 454 03 0043 5416 was seized by law
24 enforcement, neither **Hoan Thai TRAN** nor the intended recipient would have been
25 aware of the disruption on the date this currency was shipped, April 27, 2017. According
26 to UPS employees, UPS Parcel *5416 was expected to take up to 7-10 days to arrive in
27 Minnesota.

1 26. DEA Special Agent Joseph Pelz and TFO Klokow confirmed that **Hoan**
2 **Thai TRAN** is associated with individuals at 8336 39th Ave. S., Seattle, WA 98118 (now
3 residing at **Subject Residence 2**) when they observed **Hoan Thai TRAN** arrive at the
4 residence driving **TV-1** on July 13, 2017. Prior to **Hoan Thai TRAN**'s arrival at 8336
5 39th Ave. S., Seattle, WA, TFO Klokow and SA Pelz were conducting surveillance on
6 **TV-1** and observed **Hoan Thai TRAN** at a confirmed clandestine marijuana grow (more
7 fully described below), located at 11402 61st Avenue S., Seattle, WA and maintained by
8 individuals by the names of **Mai Ngoc HUYNH** and **Minh NGO**, as further detailed
9 below.

10 27. Subsequent to the \$10,000 seizure at 8336 39th Ave. S., Seattle, WA 98118,
11 agents began investigating the individuals residing at that address and their association to
12 **Hoan Thai TRAN**. Since August 2017, investigators have observed and documented the
13 vehicle previously identified as "TV-3", a gold Toyota Sienna minivan previously
14 registered to and driven almost exclusively by Hung HONG, **TV-4** and **TV-8** at 8336 39th
15 Ave. S., Seattle, WA 98118, and at **Subject Residence 2** on a regular basis. Hung HONG
16 was observed returning to **Subject Residence 2** on August 29, 2018 and was observed at
17 the residence during the days following, however, investigators have not observed Hung
18 HONG at **Subject Residence 2** since September 5, 2018, and are currently attempting to
19 locate Hung HONG. Since August 2017 and as recently as October 8, 2018, based on
20 physical and electronic surveillance, investigators have observed that **TV-4** is driven on a
21 near daily basis, almost exclusively by **Truc TRAN**. Investigators have also observed, as
22 recently as October 7, 2018, that **TV-8** is driven on a near daily basis, almost exclusively
23 by **Thanh Thao Chi THANH**, though **TV-8** is registered to **Anh Nguyen TRAN**. As
24 described below, **Thanh Thao Chi THANH** shipped a large parcel found to contain
25 suspected marijuana in June 2018 using **Truc TRAN**'s vehicle, **TV-4**. Investigators also
26 observed that **Truc TRAN** and **Thanh Thao Chi THANH** were absent and apparently
27 traveling as well from July 2018 through August 29, 2018. During this time frame,
28 investigators observed **TV-4** continued to be driven on a daily basis by other members of

1 the **Subject Residence 2** household, believed to be **Anh Nguyen TRAN** and **Dai TRAN**,
2 as well as another unknown Asian male frequenting the residence.

3 28. Postal Inspectors are aware that, in the past 27 months, the residents at
4 8336 39th Ave. S., Seattle, WA 98118, now residing at **Subject Residence 2**, have
5 received approximately 73 Priority or Priority and/or Express Mail parcels suspected to
6 contain narcotics proceeds or used narcotics packaging. Those parcels were mailed from
7 out of state addresses, primarily Minnesota and Louisiana. As detailed below, twenty-
8 three of these parcels have been intercepted and searched pursuant to warrants issued in
9 the Western District of Washington. Regular physical and electronic surveillance, as
10 recently as October 9, 2018, and USPS business records, confirm that the suspects
11 previously residing at 8336 39th Ave. S., Seattle, WA 98118 re-located on approximately
12 March 30, 2018 to **Subject Residence 2**. On October 8, 2018, at approximately 1:28
13 PM, investigators observed a large U-Haul truck back into the front yard of **Subject**
14 **Residence 2** and load the vehicle with boxes, bags and some furniture. Investigators
15 followed the U-Haul to a residence located at 21739 123rd Ave. SE, Kent, WA, 98031,
16 where a 2009 blue Acura sedan registered to **Dai Thanh TRAN** and a silver Subaru
17 hatchback belonging to an unidentified Asian female believed to be **Dai Thanh TRAN's**
18 girlfriend were observed in the early morning hours of October 9, 2018, as further
19 detailed below.

20 29. Individuals believed to be residing previously at 8336 39th Ave .S., Seattle,
21 WA 98118, and now residing at **Subject Residence 2** as of March 2018 include **Truc**
22 **TRAN, Hong BUI, Thanh Thao Chi THANH, Anh Nguyen TRAN**. This is based on
23 extensive surveillance observations, as described in detail below.

24 30. The suspect parcels addressed to **Subject Residence 2** have been
25 previously addressed to legitimate residents including **Truc TRAN** and **Hong BUI**, and
26 also to fictitious names including "Andy Tran." According to postal records, parcel
27 EL836408371US, which was found to contain \$8,500 in miscellaneous blank money
28

orders concealed between blank sheets of paper, was signed for by Hung HONG on December 2, 2017 at 8336 39th Ave. S., Seattle, WA.

31. The following parcels addressed to the residents at 8336 39th Ave. S., Seattle, WA 98118, related PO Box 18733 Seattle, WA (which, according to postal records, lists 8336 39th Ave. S., Seattle, WA 98118 as physical address) or new residence, **Subject Residence 2**, have since been further investigated and searched under the authority of the following federal search warrants issued in the Western District of Washington:

Date:	SW#:	Address:	USPS Tracking #:	Contents:
5/25/17	MJ17-216	8336 39 th Ave. S.	9505 5154 2396 7142 1253 52	74 Used Mylar Bags
6/02/17	MJ17-227	P.O. Box 18733	EL796648456	16 Blank Money Orders Totaling \$12,948.16
10/04/17	MJ17-424 (1)	8336 39 th Ave. S.	9505 5152 0637 7275 0852 04	26 Used Mylar Bags
10/04/17	MJ17-424 (2)	8336 39 th Ave. S.	9505 5152 0637 7275 0852 11	49 Used Mylar Bags
11/30/17	MJ17-503	8336 39 th Ave. S.	EL836408371US	11 Blank Money Orders Totaling \$8,500.00
1/30/18	MJ18-044 (1)	8336 39 th Ave. S.	9505 5152 0637 8024 1119 39	7 Large Sheets of Plastic
1/30/18	MJ18- 044(2)	8336 39 th Ave. S.	9505 5152 0637 8024 1119 46	58 Mylar Bags
2/14/18	MJ18-065	8336 39 th Ave. S.	9505 5156 1804 8040 1993 96	Large Sheets of Plastic and 27 Used Mylar Bags
2/28/18	MJ18-079 (1)	8336 39 th Ave. S.	9505 5154 2396 8051 2099 11	5 Large Sheets of Plastic and 28 Used Mylar Bags
2/28/18	MJ18-079 (2)	8336 39 th Ave. S.	9505 5154 2396 8051 2099 28	5 Large Sheets of Plastic and 28 Used Mylar Bags

1	3/06/18	MJ18-093	8336 39 th Ave. S.	9505 5154 2399 8061 2776 62	5 Large Sheets of Plastic and 27 Used Mylar Bags
2					
3	3/14/18	MJ18-109	8336 39 th Ave. S.	9505 5152 0637 8066 1217 50	3 Large Sheets of Plastic and 25 Used Mylar Bags
4					
5	3/22/18	MJ18-126	8336 39 th Ave. S.	9505 5152 0637 8075 1232 02	5 Large Sheets of Plastic and 28 Used Mylar Bags
6					
7	3/29/18	MJ18-154	8336 39 th Ave. S.	9505 5157 8507 8080 2369 12	4 Large Sheets of Plastic and 32 Used Mylar Bags
8					
9	3/29/18	MJ18-153	8336 39 th Ave. S.	9505 5157 8506 8082 2252 81	4 Large Sheets of Plastic and 28 Used Mylar Bags
10					
11	4/02/18	MJ18-155	8336 39 th Ave. S.	9505 5154 2398 8087 2390 34	4 Large Sheets of Plastic and 27 Used Mylar Bags
12					
13	4/12/18	MJ18-169	8336 39 th Ave. S.	9505 5143 9216 8094 2608 54	3 Large Sheets of Plastic and 29 Used Mylar Bags
14					
15	5/08/18	MJ18-214	Subject Residence 2	9505 5152 0637 8120 1322 27	Clothing – No Contraband ⁴
16					
17	5/11/18	MJ18-218	Subject Residence 2	9505 5124 8792 8127 1199 78	4 Large Sheets of Plastic and 27 Used Mylar Bags
18					
19	5/17/18	MJ18-227	Subject Residence 2	9505 5124 8792 8134 1226 33	4 Large Sheets of Plastic and 17 Used Mylar Bags
20					
21	6/08/18	MJ18-259	Subject Residence 2	9505 5154 2398 8152 2601 23	4 Large Sheets of Plastic and 23 Used Mylar Bags
22					
23	6/27/18	MJ18-307	Subject Residence 2	9505 5131 5989 8171 2173 57	Clothing – No Contraband ⁵

⁴ As detailed in the supporting Affidavit for Search Warrant MJ18-214, a drug-detection canine did not alert to this parcel prior to agents obtaining the search warrant.

⁵ As detailed in the supporting Affidavit for Search Warrant MJ18-307, a drug detecting canine did alert to this parcel before agents obtained the search warrant. I know through my training and experience that it is common for the odor of narcotics to transfer to clothing or other items when stored near or packaged by someone recently handling narcotics.

1 32. The Mylar bags referenced in the table above appear to have been
2 previously used as narcotics packaging. Each smelled faintly of marijuana and dryer
3 sheets (some still contained dryer sheets) and were covered in remnants of dried spray
4 foam and tape. The large plastic sheets referenced in the table above range in size from 2'
5 x 3' to 2' x 6' in size and have also been covered in remnants of dried spray foam and
6 smelled faintly of marijuana, dryer sheets and glue. Through my training and experience,
7 I know that Mylar bags of this type and size hold approximately 1 pound of marijuana
8 each, indicating to me that **Truc TRAN**, Hung HONG, **Thanh Thao Chi THANH** and
9 other individuals residing or previously residing at **Subject Residence 2** have aided or
10 facilitated the transportation of at least 553 pounds of marijuana from the state of
11 Washington to the state of Minnesota over approximately the past year.

12 33. USPS and law enforcement databases indicate that the suspected sender of
13 the suspect parcels described in the chart above, Kiet Huy TRAN, is the brother of **Truc**
14 **TRAN** and the son of **Hong BUI**, and that Kiet Huy TRAN was a resident at 8336 39th
15 Ave. S., Seattle, WA 98118 in 2013, but now resides in Minnesota. Investigators believe
16 Kiet Huy TRAN is responsible for shipping drug proceeds and packaging to 8336 39th
17 Ave. S., Seattle, WA 98118, and then later to **Subject Residence 2**, in the parcels
18 described above, based on his connection to the residence, the consistency of the
19 handwriting on all of the seized parcels shipped from Minnesota, and surveillance video
20 of the following mailings of parcels containing heavy duty plastic wrap and Mylar bags
21 covered in dried spray foam, smelling of dryer sheets and marijuana:

22 34. On March 14, 2018, I reviewed surveillance video from January 24, 2018,
23 obtained from the New Prague Post Office in New Prague, MN. Between 11:06-11:09
24 AM, the video clearly shows an individual matching the most recent Washington DOL
25 photo of Kiet Huy TRAN entering the post office with two Priority Mail boxes,
26 completing shipping labels and paying to ship the two parcels at the counter. The date of
27 January 24, 2018 and these times are consistent with the shipping of Priority Mail parcels
28

1 9505 5152 0637 8024 1119 39 and 9505 5152 0637 8024 1119 46 shipped to **Subject**
2 **Residence 2** (as detailed in the chart, above).

3 35. On June 5, 2018, I reviewed surveillance video from March 7, 2018,
4 obtained from the New Prague Post Office in New Prague, MN. Between 3:18-3:21 PM,
5 the video clearly shows an individual matching the most recent Washington DOL photo
6 of Kiet Huy TRAN entering the post office with one Priority Mail box, completing the
7 shipping label and paying to ship the parcel at the counter with cash. The date of March
8 7, 2018 and this time frame are consistent with the shipping of Priority Mail parcel 9505
9 5152 0637 8066 1217 50 shipped to **Subject Residence 2** (as detailed in the chart,
10 above).

11 36. According to USPS and law enforcement databases, Kiet TRAN is most
12 recently associated with the addresses 17745 Valley Cove Ct., Minnetonka, MN 55345
13 and 1111 Horseshoe Ln, New Prague, MN 56071. According to USPS business records,
14 Kiet Tran regularly receives mail at 1111 Horseshoe Ln, confirmed as recently as
15 October 1, 2018.

16 **F. Financial Records Associated with Residents at Subject Residence 2**

17 37. Throughout this investigation, investigators have observed **Truc TRAN**
18 travel to and from **Subject Residence 2** and make near daily visits in **TV-4** to multiple
19 card rooms and casinos in the greater Seattle area, primarily Great American, Fortune and
20 Riverside casinos in Tukwila, Washington. Through my training and experience I am
21 aware that individuals engaged in narcotics trafficking often frequent casinos in an effort
22 to launder narcotics proceeds. **Truc TRAN** has been under investigation and regular law
23 enforcement surveillance since July 2017, has no known employment or legitimate
24 income.

25 38. On October 1, 2018, I reviewed records provided by Washington State
26 Employment Security Department on September 27, 2018 and confirmed that the last
27 income reported by any employer for **Truc TRAN** was reported by "AJI" in Quarter 4 of
28 2015 in the amount of \$88.00. In October 2017 **Truc TRAN** cashed the following money

orders, all purchased outside the State of Washington at the Roman Casino (each of which had her name and previous address "8336 39th Ave. S" written on the back side of each money order):

Serial Number	Issue Date	Face Amount	Agent DBA	Street Address	City	State
20750586754	10/11/2017	\$1,000	WAL-MART	1501 MANHATTAN BLVD	HARVEY	LA
20751941658	10/11/2017	\$1,000	WAL-MART	4001 BEHRMAN HWY	NEW ORLEANS	LA
20755822591	10/11/2017	\$1,000	WAL-MART	4810 LAPALCO BLVD	MARRERO	LA
20755822592	10/11/2017	\$1,000	WAL-MART	4810 LAPALCO BLVD	MARRERO	LA
20742841376	10/12/2017	\$1,000	WAL-MART	39142 NATCHEZ DR	SLIDELL	LA
20742841377	10/12/2017	\$1,000	WAL-MART	39142 NATCHEZ DR	SLIDELL	LA
20750586754	10/11/2017	\$1,000	WAL-MART	1501 MANHATTAN BLVD	HARVEY	LA

39. As previously detailed, on November 30, 2017, U.S. Postal Inspectors applied for and obtained federal search warrant MJ17-503 for Express Mail parcel EL836408371US addressed to "**Truc TRAN**, 8336 39th Ave. S., Seattle, WA 98118," with a return address of "Minh Hoang, 621 Lakeshore Village Dr., Slidell, LA 70461." The parcel was found to contain a stack of blank white paper inside a sealed manila envelope. Between the sheets of blank white paper, eleven (11) money orders totaling \$8,500 were concealed, taped face down on blank white sheets of paper. The money orders were all purchased on November 29, 2017 from various locations including Rouse's Enterprises, LLC, MoneyGram and Western Union. The money orders were documented, returned to the mail stream and delivered to 8336 39th Ave. S., Seattle, WA. Negotiated copies of the MoneyGram money orders revealed that one of the money orders from this parcel, bearing serial number 20772820741, was cashed by **Truc TRAN** at Roman Casino in the amount of \$1000. A note on the front of the negotiated money order read "8336 39th Ave S Seattle WA 98118," and the reverse had **Truc TRAN's** name and her Washington State driver's license number.

40. According to surveillance and data produced by the GPS tracking device affixed to **TV-4**, since returning on August 29, 2018, **TV-4** has frequented the Great American Casino located at 14040 Interurban Ave. S., Tukwila, WA 98168, Riverside Casino directly next door, or Fortune Casino, directly across Interurban Ave. S., on at least 29 occasions, at all hours of the morning, afternoon and late into the night, as recently as October 8, 2018. Currency Transaction Reports (CTRs) filed by casinos show **Truc TRAN** has gambled large amounts of cash on multiple occasions. The table below shows some of the CTRs filed on **Truc TRAN** for activity in 2017 and 2018. Three of the CTRs reference both **Kiet TRAN** and **Truc TRAN** together conducting transactions for themselves and others.

Date	Location	Cash In	Cash Out	Notes
6/9/18	Tulalip Casino		\$12,900	
5/11/18	Great American Casino	\$11,497		
12/13/17	Canterbury Park Card Club ⁶	\$28,600	\$22,850	CTR references Truc TRAN and Kiet TRAN
12/12/17	Canterbury Park Card Club	\$0	\$10,100	CTR references Truc TRAN and Kiet TRAN
7/21/17	Canterbury Park Card Club	\$21,680	\$28,700	CTR references Truc TRAN and Kiet TRAN

41. Prior to Hung HONG's departure, regular surveillance and data produced by a judicially authorized GPS tracking device affixed to his gold Toyota Sienna minivan indicated that Hung HONG and/or his gold Toyota Sienna minivan, driven almost exclusively by Hung HONG, frequented Roman Casino on a regular basis. Based on this surveillance, investigators believe that records pertaining to casino transactions designed to conceal narcotics proceeds as casino winnings are likely to be found within **Subject Residence 2** and/or on the person of **Truc TRAN**.

⁶ According to publically available information, Canterbury Park is a horse racing track, casino and card room located at 1100 Canterbury Rd, Shakopee, MN 55379.

42. According to USPS and law enforcement databases, as well as Washington State DOL, **Thanh Thao Chi THANH** was also a resident at 8336 39th Ave. S., Seattle, WA 98118 and is believed to be the daughter of **Truc TRAN**. Regular surveillance has confirmed that she too has relocated to **Subject Residence 2**. I reviewed a summary of records obtained from US Bank regarding accounts *4888 and *3299, held in the name of **Thanh Thao Chi THANH**. Those records reflect multiple purchases from "Uline," a company that distributes shipping, industrial and packaging materials throughout the United States. One of the many products they sell are Static Shielding Bags, or – as referenced above – Mylar bags. According to the website, the cost for a box of 100 bags that are the approximate size of the bags shipped back to 8336 39th Avenue S., Seattle, WA and **Subject Residence 2** is approximately \$106. The following purchases from Uline appear in the records for **Thanh Thao THANH's** US Bank accounts:

Account Holder	Account No.	Clear Date	Statement Description	Withdrawal
Thanh, Thao Chi T	USB CC **** * 4888	3/21/2017	Uline*Ship Supplies	\$135.75
Thanh, Thao Chi T & Tran, Anh Nguyen T	USB 1 *** **** 3299	11/28/2016	Uline*Ship Supplies	\$152.21
Thanh, Thao Chi T & Tran, Anh Nguyen T	USB 1 *** **** 3299	2/28/2017	Uline*Ship Supplies	\$328.50

43. Other records reviewed associated with **Thanh Thao Chi THANH's** US Bank checking account ***3299 indicate that **Anh Nguyen TRAN** was later added as a signer on the account. From December 15, 2014 through February 14, 2018 when the account closed, deposits to this account totaled \$226,307.57. Of that amount, \$150,400 (67%) consisted of cash, \$13,881 consisted of IRS Tax Refunds, \$4,841 was Financial Aid for the University of Washington, and \$10,755.17 consisted of payroll deposits from Victoria's Secret. Additionally, Kiet TRAN transferred \$1,000 from his US Bank account to **Thanh Thao Chi THANH's** account on October 5, 2016.

1 44. Several of the cash deposits to **Thanh Thao Chi THANH**'s account were
2 made at US Bank branches in Minnesota; these same branches were also used to make
3 cash deposits to other known US Bank accounts. For example, among available records
4 for the identified targets of this investigation, nineteen cash deposits were made at US
5 Bank branches in Bloomington, Minnesota. Of these nineteen deposits, four were made
6 directly to the US Bank account of **Hoan Thai TRAN** and **Dung Ngoc LU**, while fifteen
7 were made to the US Bank account of **Thanh Thao Chi THANH** and **Anh Nguyen**
8 **TRAN**. In total, at least \$76,900 in cash was deposited to the US Bank accounts of
9 **Thanh Thao Chi THANH**, **Anh Nguyen TRAN**, **Hoan Thai TRAN**, and **Dung Ngoc**
10 **LU** at Minnesota branches. As noted elsewhere, all of these individuals are residents of
11 Washington State.

12 45. **Dai Thanh TRAN** is another individual previously residing at 8336 39th
13 Ave. S., Seattle, WA 98118, who relocated to **Subject Residence 2** in March 2018 and
14 then to 21739 123rd Ave. SE, Kent, on October 8, 2018. I have reviewed a summary of
15 financial information provided by Bank of America regarding an account in **Dai Thanh**
16 **TRAN**'s name, Account ***7230. **Dai Thanh TRAN** opened this account on August 29,
17 2011. The address associated with his account was 8336 39th Ave S, Seattle; this address
18 remained on bank statements through March 2018. Beginning in March 2018, **Dai**
19 **Thanh TRAN**'s bank statements indicate that the address associated with the account is
20 **Subject Residence 2**. From December 11, 2015 through July 17, 2018, deposits to this
21 account totaled \$122,085.06. Of this amount, \$69,940 (57%) likely consisted of cash and
22 \$31,600.65 (26%) consisted of Best Buy or AMR (American Medical Response) Inc.
23 payroll deposits. An additional \$2,449 consisted of Federal Income Tax Return refunds.
24 Investigators confirmed that **Dai Thanh TRAN** is employed by AMR when they
25 followed him to an AMR location in Tukwila, WA on December 14, 2017. Investigators
26 have observed an Asian male, believed but not confirmed to be **Dai Thanh TRAN**, on
27 numerous occasions walking around the East side of the residence at **Subject Residence**
28 **2** to access the area of the property previously believed to contain an illegal marijuana

1 grow. Many of the cash deposits made to Account ***7230 were at branch locations
2 outside of Washington State, such as Minnesota, Georgia, and Oregon. Records indicate
3 that **Dai Thanh TRAN** withdrew more than \$32,000 of the deposited funds in cash.

4 **G. Additional Surveillance at 8336 39th and Subject Residence 2**

5 46. Investigators believe that suspects **Truc TRAN**, **Hung HONG**, **Hong BUI**,
6 **and Thanh Thao Chi THANH**, **Anh Nguyen TRAN**, **Dai Thanh TRAN** and possibly
7 others residing at **Subject Residence 2** (previously residing at 8336 39th Ave. S., Seattle,
8 WA) were maintaining clandestine marijuana grow operations inside these respective
9 residences from at least August 2017 until traveling out of the country in July 2018. **Truc**
10 **TRAN**, **Hung HONG**, **Thanh Thao Chi THANH** and **Hong BUI** returned from their
11 travels to **Subject Residence 2** in late August 2018. The most recently available power
12 records as of August 14, 2018 do not indicate the presence of a clandestine marijuana
13 grow; updated records will not be available from SCL until mid to late October 2018.

14 47. On August 24, 2017 (DEA Special Agent Joseph Pelz) and December 14,
15 2017 (KCSO Detective Chris Przygocki), were conducting surveillance at 8336 39th Ave.
16 S., and identified and reported the odor of growing marijuana, based on their training and
17 experience. SA Pelz has been employed as a Special Agent with DEA since 2012 and
18 Detective Przygocki has been employed by the King County Sheriff's Department since
19 2008. Both have extensive training and experience investigating narcotics trafficking and
20 clandestine marijuana growing operations and are able to discern between the odor of
21 burning marijuana and growing marijuana. It is common for investigators conducting
22 regular surveillance to observe four or more unknown vehicles (not associated with the
23 residences) frequenting these respective properties on the same day. Through my training
24 and experience I know it is common for individuals engaged in narcotics trafficking to
25 make frequent and brief stops for purposes of picking up or dropping off contraband or
26 currency at suspect residences.

27 48. Also on December 14, 2017, at approximately 1:28 PM, Detective
28 Przygocki and I observed that the garage door to the residence was open, and observed

1 Hung HONG carrying several large, folded cardboard boxes from the garage through the
2 front door of the residence. At approximately 1:31 PM, I observed Hung HONG place a
3 cardboard box in the front passenger seat of his gold Toyota Sienna minivan before he
4 returned to the residence.

5 49. On March 11, 2018, I reviewed surveillance video at 8336 39th Ave. S.,
6 Seattle, WA 98118 recorded on March 10, 2018. At 1:14 PM, I observed two Asian
7 males, Hung HONG and an unknown Asian male, carrying large Lowe's cardboard boxes
8 from the front door of the residence to the driveway. Because of the angle of the camera,
9 I was unable to see whether or not these boxes were placed in vehicles. I know through
10 my training and experience that it is common for individuals shipping marijuana through
11 the U.S. Mail or other shipping providers to use large standardized cardboard boxes
12 easily purchased from businesses such as Lowe's, Home Depot, U-Haul, UPS, FedEx or
13 USPS.

14 50. On March 12, 2018, I reviewed surveillance video recorded at 8336 39th
15 Ave. S., Seattle, WA 98118 on March 8, 2018. At approximately 9:48 AM, I observed
16 **Truc TRAN** exiting the residence carrying a white cardboard box and white trash bags.
17 **Truc TRAN** opened the side door of Hung HONG's gold Toyota Sienna minivan and
18 placed the items in the back seat of the minivan. **Truc TRAN** then walked around to the
19 other side of the vehicle and struggled to pull the door shut. A young Asian male,
20 believed to be **Anh Nguyen TRAN** walked out of the residence and assisted **Truc**
21 **TRAN** in shutting the door of the minivan. I know through my training and experience
22 that it is common for individuals engaged in narcotics trafficking to dispose of trash or
23 packaging materials and other evidence of their criminal activity at locations away from
24 their residences, in an effort to evade law enforcement. At approximately 9:51 AM, as
25 **Truc TRAN** drove the gold Toyota Sienna minivan out of the driveway, a large
26 cardboard box could clearly be seen placed in the front passenger seat.

27 51. I also reviewed surveillance footage recorded on May 16, 2018, by a
28 surveillance camera positioned outside **Subject Residence 2**. At approximately 8:49 PM,

1 **Truc TRAN** backed **TV-4** through the gate and into the front yard of **Subject Residence**
2 **2**. The trunk of **TV-4** then opened and I observed Hung HONG carrying two large
3 cardboard boxes from the front door of the residence and place them in the trunk of **TV-**
4 **4**. **Truc TRAN** stood near the vehicle as this took place. The boxes were clearly heavily
5 taped at all seams, and of substantial weight based on the way Hung HONG carried them.
6 As I continued to review surveillance video recorded the same evening at **Subject**
7 **Residence 2**, it became more difficult to see clearly in the dark. At approximately
8 10:17 PM, I observed headlights shining on the residence from the driveway and an
9 individual who I believe to be Hung HONG walking to the vehicle carrying a suitcase.
10 Investigators did not observed Hung HONG at **Subject Residence 2** again until August
11 29, 2018.

12 52. On May 24, 2018, I was conducting surveillance at **Subject Residence 2**.
13 At approximately 2:35 PM, I walked along a public alley running parallel to 38th Ave. S.,
14 behind the residence. From the alley way, I was able to clearly see a thick tube or water
15 hose protruding through the siding of the residence where the side of the roof meets what
16 appears to be some kind of separate addition to the **Subject Residence 2**. Investigators
17 have observed residents and visitors frequently leaving through the front door of the
18 residence and walking around the east side of the house to this same area and returning
19 with trash bags that are then placed in a vehicle or garbage that is then placed in recycling
20 or trash bins in front of the residence. I know through my training and experience that it
21 is common for individuals engaged in operating clandestine marijuana grow operations to
22 construct unconventional spaces, watering methods, power and heat sources to
23 accommodate indoor cultivation.

24 53. Later that same day, I reviewed surveillance video recorded on May 24,
25 2018, outside the residence of **Subject Residence 2**. At approximately 9:00 PM, I
26 observed the bed of what appeared to be a gold Chevrolet Avalanche pickup truck back
27 into one of the parking spaces in front of the residence. I then observed an Asian male
28 walk away from the vehicle toward the residence. **Truc TRAN** exited through the front

1 door to meet the unknown male and the two of them walked around the east side of the
2 residence toward the small addition to the **Subject Residence 2** described above. They
3 returned moments later carrying three full, large garbage bags and one smaller white
4 plastic bag and walked over to the pickup truck. The unknown male entered the residence
5 briefly and departed thereafter. During this transaction **TV-4** was parked in the driveway
6 of **Subject Residence 2**. I know through my training and experience that it is common
7 for individuals transporting marijuana to other parts of the country to obtain and/or trade
8 marijuana crops depending on demand from their customers and their ability to
9 successfully transport marijuana by any given method at any given time.

10 **H. June 4, 2018 Shipment of UPS Parcel**

11 54. On June 4, 2018, Postal Inspector Nelson Rivera and I were conducting
12 surveillance at **Subject Residence 2**. At approximately 1:47 PM., I was monitoring a
13 surveillance camera positioned on a public street and observed two individuals, an Asian
14 male believed to be **Subject Residence 2** resident **Anh Nguyen TRAN** and a woman I
15 recognized as **Thanh Thao Chi THANH**, load a large cardboard box into **TV-4**. At
16 approximately 4:19 PM, Inspector Rivera and I observed **Truc TRAN** and **Thanh Thao**
17 **Chi THANH** exit **Subject Residence 2** and pull away in **TV-4**. With the aid of a
18 judicially authorized GPS tracking device, Inspector Rivera and I followed **TV-4** directly
19 from **Subject Residence 2** to the UPS store located at 3815 S. Othello St. Ste. 100,
20 Seattle, WA 98118. **TV-4** made no other stops along the route. Inspector Rivera
21 observed **Truc TRAN** driving **TV-4**. Inspector Rivera then followed **Thanh Thao Chi**
22 **THANH** inside the UPS Store and observed the shipment of UPS Parcel 1Z 37Y 454 03
23 0149 3816 at approximately 4:30 PM. According to data produced by the GPS tracking
24 device, **TV-4** returned home to **Subject Residence 2** directly after the shipment. At
25 approximately 6:42 PM, UPS Parcel 1Z 37Y 454 03 0149 3816 was released to me by
26 UPS customer service for further investigation. Upon further examination, I could detect
27 a slight odor of marijuana emanating from the parcel and observed what appeared to be
28 dried spray foam that was visibly stuck to one of the corners of the box. UPS Parcel 1Z

1 37Y 454 03 0149 3816 was addressed to "John Smith, 1111 Horseshoe Ln SE, New
2 Prague, MN 56071," with a return address of "Nancy Smith, 3469 S. 152nd St., Seattle,
3 WA 98188." On June 5, 2018, at approximately 9:25 AM, a narcotics detection canine
4 alerted to the odor of narcotics emanating from UPS Parcel 1Z 37Y 454 03 0149 3816,
5 which was then referred to investigators in New Prague, MN for further investigation.

6 55. On June 8, 2011, postal inspectors in Minneapolis, MN applied for and
7 obtained a federal search warrant 18-MJ-533-BRT in the District of Minnesota for UPS
8 Parcel 1Z 37Y 454 03 0149 3816. Inspector Wicker executed that warrant on June 11,
9 2018 and seized 11, 386 grams of a green leafy substance, which was field tested and
10 returned positive results for marijuana/Tetrahydrocannabinol (THC). The drug packaging
11 containing the marijuana recovered from UPS Parcel 1Z 37Y 454 03 0149 3816 is
12 identical to the empty packaging observed in 18 of the parcels referenced above shipped
13 from the greater Minneapolis, MN area to 8336 39th Ave. S., Seattle, WA 98118 and

14 **Subject Residence 2.**

15 56. I know through my training and experience that it is common for
16 individuals shipping narcotics to use multiple shipping means to transport narcotics and
17 narcotics proceeds, in an effort to evade U.S. Postal Inspection Service and other law
18 enforcement detection. I also believe, based on my observations in this investigation, the
19 2017 interdiction of the USPS parcel containing \$10,000 in U.S. Currency, the 2017 UPS
20 parcel shipped by **Hoan Thai TRAN**, and the UPS parcel seized June 4, 2018, all
21 referenced above, that the individuals residing at **Subject Residence 2** were likely using
22 UPS to ship and receive contraband as an alternative to USPS until June 2018, when law
23 enforcement took enforcement action.

24 57. On September 24, 2018, I reviewed records obtained from UPS related to
25 the residences of 8336 39th Ave. S., Seattle, WA, **Subject Residence 2**, and
26 1111 Horseshoe Ln SE, New Prague, MN 56071. For the period March 1, 2018 through
27 April 6, 2018, at least eight UPS parcels weighing between .5 and 4 pounds were shipped
28 from various UPS stores in Minnesota to 8336 39th Ave. S., Seattle, WA. For the period

1 April 11, 2018 through June 4, 2018, at least twelve UPS parcels weighing between .8
2 and 3.6 pounds were shipped from various UPS stores in Minnesota to **Subject**
3 **Residence 2**. I know through my training and experience interdicting parcels containing
4 narcotics proceeds that the weight range of these twenty UPS parcels received by the
5 individuals now residing at **Subject Residence 2** is consistent with parcels containing
6 large amounts of U.S. Currency. For the period March 5, 2018 through June 4, 2018, at
7 least eleven parcels were shipped from the same UPS Store in Seattle, WA located at
8 3815 S. Othello St. Ste. 100, Seattle, WA 98118 to Kiet TRAN's residence located at
9 1111 Horseshoe Ln SE, New Prague, MN. Available information related to these parcels
10 shipped to Minnesota is limited, however, addressee information is available for two of
11 the parcels, both of which were found to be the addressed to the presumably fictitious
12 "John Smith."

13 58. According to data produced by the GPS tracking device affixed to **TV-4**,
14 prior to June 4, 2018, the vehicle parked in the vicinity of and/or across the street from
15 the UPS Store on S. Othello multiple times per week. Based on these events, I believe
16 that residents of **Subject Residence 2, Truc TRAN, Hung HONG, Thanh Thao Chi**
17 **THANH, Anh Nguyen TRAN, Dai Thanh TRAN** and others are engaged in growing
18 and/or collecting finished marijuana product from other producers and packaging that
19 marijuana in Mylar bags which have been transported back and forth from Washington to
20 Minnesota on multiple occasions for re-use. Based on the shipment of UPS Parcel 1Z
21 37Y 454 03 0149 3816 and the indication from the UPS store employee that they are
22 regular customers, I believe **Truc TRAN, Hung HONG, Thanh Thao Chi THANH,**
23 **Anh Nguyen TRAN, Dai Thanh TRAN, Kiet TRAN,** and likely others, are
24 collaborating to illegally transport large amounts of marijuana out of the state of
25 Washington to Minnesota for re-distribution there.

26 59. Based on my training and experience, and participation in narcotics
27 investigations, and based on my conversations with other experienced narcotics officers
28 who I am associated with, I am aware that marijuana is among the top cash crops in the

1 U.S. economy because the profit yield versus production cost is so high. An average
2 marijuana plant might yield four ounces of consumable marijuana. Currently, in this area,
3 a conservative estimate of the cost of marijuana is about \$250.00 per ounce. That said, an
4 average marijuana plant could yield \$1,000.00 per plant. A conservative time frame to
5 cultivate a marijuana plant from seedling to harvest is about 120 days. Therefore, a
6 person growing one crop at a time could grow three separate crops per year. Using these
7 assumptions, someone growing crops of, for example; one hundred plants, three times a
8 year, generating \$1,000 per plant would generate \$300,000.00 in cash per year, tax free. I
9 am also aware, through my training and experience and participation in narcotics
10 investigations that the same amount of marijuana in other parts of the country, such as
11 Minnesota, where marijuana has not been legalized and is more aggressively enforced by
12 law enforcement, is often valued at three times the amount it is in the state of
13 Washington, making it drastically more profitable to grow the marijuana here and use any
14 means possible to transport the marijuana for distribution in other parts of the country.

15 **I. Controlled Delivery of UPS Parcel in New Prague, MN**

16 60. On June 11, 2018, investigators conducted a controlled delivery of UPS
17 Parcel 1Z 37Y 454 03 0149 3816 at 1111 Horseshoe Ln SE, New Prague, MN 56071.
18 UPS Parcel 1Z 37Y 454 03 0149 3816 was delivered to the residence under surveillance
19 at approximately 11:32 am (MT) and officers observed that it was brought into the
20 residence by Kiet TRAN. Investigators executed an anticipatory search warrant at the
21 residence shortly thereafter and confirmed that Kiet TRAN, his wife, and two young
22 children were living at the residence. During the search, investigators recovered UPS
23 Parcel 1Z 37Y 454 03 0149 3816, and located stacks of U.S. Currency hidden in a pair of
24 socks, then again hidden inside a printer, three handguns, a concealed weapons permit,
25 designer perfumes, a large amount of fine jewelry, dozens of hand-written, unexplained
26 receipts, Western Union money order receipts referencing international transactions in
27 Australia and three new vehicles, two of which are high end Mercedes. According to
28 Postal Inspector S. Wicker who interviewed Kiet TRAN, he told investigators that he

owns a business, Tran Home Remodeling, and worked in construction, however, Kiet TRAN was unable to state specifically where or when he works. Further, no tools, clothing, work boots or equipment consistent with construction work were identified anywhere in the residence.

61. Also during the search, Kiet TRAN and Anh H. NGUYEN consented to a search of their cellular phones. Kiet TRAN was in possession of a prepaid "burner phone" (with no known associated subscriber information), with an unidentified number (believed to be (612) 404-8782 based on toll records), and a Samsung Galaxy 8 cellular phone with assigned number (952) 564- 4872. Kiet TRAN's wife, Anh H. NGUYEN was in possession of a white iPhone.

62. On Kiet TRAN's phones, investigators observed photos of financial documents belonging to other individuals, including blank checks associated with a Tanh T. CAO in Sacramento, CA, **Mai Ngoc HUYNH** at 11402 61st Ave. S., Seattle, WA 98178 and "**Hoan TRAN**, 7433 48th Ave. S., Seattle, WA 98118" (**Hoan Thai TRAN**'s residence prior to moving to **Subject Residence 1** in February 2017, and current address on file with USPS). Investigators also observed a photo of stacks of U.S. Currency on what appears to be the kitchen counter of Kiet TRAN's residence. As previously indicated, **Mai Ngoc HUYNH** was a resident at 11402 61st Ave. S., Seattle, WA 98178 in June 2017 when investigators executed a search warrant at that residence and confirmed that it was a clandestine marijuana grow operation. Investigators have also observed **Hoan Thai TRAN** driving **TV-1** at 11402 61st Ave. S., Seattle, WA 98178 on multiple occasions and **Hoan Thai TRAN**'s current residence, 15014 42nd Ave. S., Seattle, WA 98188 (**Subject Residence 1**), was located written on the back of a wall calendar inside the 61st Ave. address during the 2017 search warrant execution.

63. Also during the search of Kiet TRAN's residence, investigators reviewed the call log on Anh H. NGUYEN's phone. The call log referenced multiple daily calls to telephone number (612) 404-8782, whose contact name was listed under the name

1 “Daddy,” whom investigators believe to be Kiet TRAN. Investigators also observed
2 records of calls to two international telephone numbers.

3 64. During the search warrant execution at Kiet TRAN’s residence,
4 Investigators also observed a photocopy of Kiet TRAN’s 2017 Federal Income Tax
5 return. According to the return, Kiet TRAN filed as Head of Household with two minor
6 children as deductions. The Schedule C show gross receipts of \$45,800 from Tran’s
7 business, Tran Home Remodeling. Expenses totaling \$17,204 were deducted, leaving a
8 net income of \$28,596. I have reviewed a summary of financial records associated with
9 six bank accounts maintained by Kiet TRAN at US Bank, Bank of America and TCF
10 Bank. TCF Bank records located during the search show that Kiet Tran opened a new
11 small business checking account on June 8, 2018 in the name of Tran Home Remodeling
12 Inc, account number 7444366037. According to those records, the following chart
13 summarizes Kiet TRAN’s reported gross income and deposits for 2017, indicating a large
14 amount of unexplained cash:

15

Year:	Tax Return Income:	Total Cash Deposits:
2017	\$45,800	\$314,560

16
17
18 **J. Further Investigation of Subject Residence 2**

19 65. On July 17, 2018, I reviewed surveillance video at **Subject Residence 2**
20 recorded on July 17, 2018. At approximately 9:00 AM, I observed an unknown older
21 Asian male and an unknown younger Asian male exit the front door of **Subject**
22 **Residence 2** and walk around the East side of the residence. I observed the two males
23 make several brief trips back and forth from the East side of the residence, where
24 investigators believe that residents at **Subject Residence 2** previously maintained a small
25 clandestine marijuana grow operation, back to the front door. As previously described,
26 through my training and experience, I am aware that individuals operating clandestine
27 marijuana grows often create and/or use additions, outbuildings or unconventional spaces
28

1 to cultivate marijuana, especially if the residence is occupied. The fact that investigators
2 routinely observe individuals accessing the East side of the residence from a separate
3 entrance, and have previously observed large garbage bags being carried to and from that
4 area, indicates that portion of the residence has been altered and/or added on as separate
5 from the living space. I also observed the older Asian male carrying a cardboard box
6 from the East side of the residence to the area where the recycling bins are kept.

7 66. On July 24, 2018, I reviewed surveillance video recorded at **Subject**
8 **Residence 2** on June 21, 2018. At approximately 10:41 AM, I observed **Truc TRAN**
9 carrying a large, bulging black garbage bag from **Subject Residence 2** to **TV-4**. At
10 approximately 11:05 AM, I observed a male exit **Subject Residence 2** carrying a large,
11 sealed cardboard box, which he placed in the trunk of **TV-8** and then entered the
12 passenger seat. **Thanh Thao Chi THANH** also exited the residence shortly thereafter,
13 checked the trunk of the vehicle and entered the driver's side of **TV-8**. **TV-8** then drove
14 away. When **TV-8** returned, the Asian male in the passenger seat, believed to be **Anh**
15 **Nguyen TRAN** opened and retrieved something from the trunk of **TV-8** and the large
16 cardboard box could no longer be seen in the trunk. At approximately 7:54 PM, I
17 observed a gold Chevrolet Avalanche (which has been previously observed at **Subject**
18 **Residence 2** picking up large garbage bags) parked in the fenced driveway on the East
19 side of the property at **Subject Residence 2**. **Truc TRAN** was observed carrying what
20 appeared to be the same large, bulging, black garbage bag she was observed carrying
21 earlier in the day, from the direction of **TV-4** back inside the residence. At approximately
22 8:01 PM, **Truc TRAN** exited the residence with an unknown Asian male, who carried a
23 large black duffel bag from the residence to the gold Chevrolet Avalanche. At
24 approximately 8:02 PM, the driver of the gold Chevrolet Avalanche returned from the
25 gold Chevrolet Avalanche and handed **Truc TRAN** a large yellow bag on the front porch
26 of the residence. I know through my training and experience that it is common for
27 individuals engaged in shipping and trafficking narcotics to distribute their product in a
28 number of ways to reduce the risk of law enforcement intervention, including selling

1 product to other local individuals who have alternative shipping contacts. I also know
2 through my training and experience that it is common for individuals engaged in growing
3 and/or trafficking marijuana to transport product in large bags given the bulk and weight
4 of the material.

5 67. On July 18, 2018, I reviewed power records, which cover the time period
6 May 2017 through June 2, 2018, provided by SCL associated with **Subject Residence 2**.
7 **Hong BUI** is listed as a resident on the account according to SCL, as is the property
8 owner at **Subject Residence 2**, Kelly M. CHE. As previously described, the residents at
9 **Subject Residence 2** relocated from 8336 39th Ave. S., Seattle, WA, in March 2018. For
10 a period of 55 days, from March 1, 2018 through June 2, 2018, the total consumption was
11 5,518 KW, resulting in a combined billing amount of \$687.25 for 55 days of power
12 during spring and summer months. On August 1, 2018, I reviewed power records, which
13 cover the time period April 16, 2018 through June 20, 2018, provided by SCL associated
14 with **Subject Residence 2**. For a period of 65 days, from April 16, 2018 through June 20,
15 2018, the total consumption was 3,357 KW, resulting in a combined billing amount of
16 \$420.61 for 65 days of power during spring and summer months. Through my training
17 and experience, I know that it is common for individuals engaged in trafficking marijuana
18 outside the state of Washington to collect product from multiple other individuals
19 according to demand, rather than attempt to grow and supply shipments on their own.
20 Based on SCL power records, and given the size of **Subject Residence 2** and the number
21 of individuals residing there, as well as the size of the small addition to the house on the
22 East side of **Subject Residence 2**, investigators believe that individuals at **Subject**
23 **Residence 2** were likely operating a small or starter marijuana grow operation at that
24 location. In addition, I conclude that **Subject Residence 2**, **TV-4** and **TV-8** are likely to
25 contain additional documentary evidence of the residents' and their co-conspirators'
26 involvement in the federal offenses listed above. These records have since been updated
27 by SCL and now reflect much lower usage and rates, resulting in a combined billing
28 amount of \$181.43 for 60 days of power. Investigators attribute the reduced power usage

1 and bill to the absence of Hung HONG, **Truc TRAN** and **Thanh Thao Chi THANH**.
2 Investigators believe that the small marijuana grow operation believed to have been
3 previously maintained inside the addition to the East side of **Subject Residence 2** was
4 likely inactive during the absence of the residents primarily believed to be responsible for
5 growing, packaging and shipping marijuana from 8810 38th Ave. S., Seattle, WA. Hung
6 HONG, **Truc TRAN** and **Thanh Thao Chi THANH** returned to the residence as of
7 August 29, 2018, however, due to billing cycles, updated power records will not be
8 available to investigators until mid to late October 2018.

9 68. As previously indicated, investigators believe that Hung HONG, **Truc**
10 **TRAN**, **Thanh Thao Chi THANH** and **Hong BUI** were out of the country for a period
11 of time (Hung HONG from May 2018 through August 2018 and **Truc TRAN**, **Thanh**
12 **Thao Chi THANH** and **Hong BUI**) from July 2018 through August 2018). On
13 August 29, 2018, I reviewed surveillance video recorded at **Subject Residence 2**. At
14 approximately 10:25 PM, I observed an Asian male open the front gate at the residence
15 and a large silver van back slowly through the gate, parking in the yard at the steps of
16 **Subject Residence 2**. Another male appeared at the rear of the minivan, the rear gate of
17 the minivan was opened and then men began unloading what appeared to be multiple
18 large cardboard boxes from the van onto the front porch of and into the residence.

19 69. At approximately 10:32 PM, **TV-4** parked in front of the residence. I
20 observed a male wearing a backpack, a female and a young child exit the vehicle and
21 enter the front door of the residence. The two males, believed to be Hung HONG and **Dai**
22 **TRAN** continued unloading large boxes from the minivan. At approximately 10:36 PM,
23 the van departed and I observed Hung HONG, **Truc TRAN** and two other males
24 standing in the front yard, then continuing to unload **TV-4** at **Subject Residence 2**.
25 According to data produced by the judicially authorized GPS tracking device affixed to
26 **TV-4**, the vehicle was stopped at SeaTac International Airport at approximately 10:16
27 PM prior to the vehicle arriving at **Subject Residence 2**. Based on these observations,
28 investigators believe that the residents at **Subject Residence 2** were traveling and have

1 now returned to their residence. **Truc TRAN** has again been observed daily at **Subject**
2 **Residence 2** and accessing and/or driving **TV-4** on a near daily basis since the evening of
3 August 29, 2018. **Thanh Thao Chi THANH** has also returned to **Subject Residence 2**
4 and has been observed driving **TV-8** on a regular basis, as recently as October 1, 2018.

5 70. On October 1, 2018, I reviewed surveillance video recorded on August 30,
6 2018 at **Subject Residence 2**. At approximately 8:42 AM, I observed Hung HONG exit
7 **Subject Residence 2** empty-handed and walk off the front steps toward the East side of
8 the residence where his gold Toyota Sienna minivan was parked. Moments later, I
9 observed Hung HONG return to the front door of **Subject Residence 2** carrying two
10 white cardboard boxes. One of the boxes was familiar to me and clearly marked as a
11 USPS Priority Mail box, identical to many of the parcels found to contain used marijuana
12 packaging, shipped from Minnesota, and searched by U.S. Postal Inspectors as discussed
13 above.

14 71. On October 7, 2018, I reviewed surveillance video recorded October 4,
15 2018 at **Subject Residence 2**. At approximately 2:19 PM, I observed **TV-4** parked in the
16 driveway at Subject Residence. I observed a black Toyota pickup truck pull up to the
17 residence, and observed **Truc TRAN** and an Asian male exit the vehicle. The Asian male
18 was observed carrying a very large, very full black garbage bag from the Toyota pickup
19 truck into **Subject Residence 2**.

20 72. On October 8, 2018, at approximately 1:28 PM, investigators observed a
21 large U-Haul truck back into the front yard of **Subject Residence 2**. From 1:28 PM to
22 3:19 PM, TFO Klokow observed **Truc TRAN**, **Hong BUI**, **Thanh Thao Chi THANH**,
23 **Dai TRAN**, **Anh NGUYEN TRAN** and several unidentified males loading boxes, bags
24 and furniture from the front door of **Subject Residence 2** and into the U-Haul truck. TFO
25 Klokow also observed **Truc TRAN** and other individuals at **Subject Residence 2**
26 throwing items away in the trash and recycle of the residence in the front yard. At
27 approximately 3:19 PM, TFO Klokow watched the U-Haul drive away from the
28 residence, followed shortly thereafter by **TV-4** and **TV-8**. At approximately 4:00 PM, SA

1 Snyder observed **TV-4** arriving at 21739 123rd Ave. SE, Kent, WA, 98031. TFO Klokow
2 observed a male driver and two male passengers exiting **TV-4**. At approximately
3 4:18 PM, SA Snyder observed the same large U-Haul truck arriving at 21739 123rd Ave.
4 SE, Kent, WA, 98031. At approximately 4:25 PM, TFO Klokow observed **TV-8** arriving
5 at 21739 123rd Ave. SE, Kent, WA, 98031, and observed **Truc TRAN** and another
6 Asian female believed to be **Thanh Thao Chi THANH** exiting **TV-8**. For approximately
7 one hour, TFO Klokow and SA Snyder watched as the three Asian males, **Truc TRAN**
8 and the Asian female unloaded boxes, bags, and furniture from the U-Haul into the
9 garage at 21739 123rd Ave. SE, Kent, WA, 98031. According to surveillance and the
10 judicially authorized GPS tracking device affixed to **TV-4**, the vehicle and/or **Truc**
11 **TRAN** has frequented 21739 123rd Ave. SE, Kent, WA, 98031 on at least seven
12 occasions since **Truc TRAN** returned to **Subject Residence 2** from her travels on
13 August 29, 2018.

14 73. On October 9, 2018, at approximately 4:45 AM, TFO Klokow observed a
15 2009 light blue Acura sedan bearing Washington license plate APM3631 parked at 21739
16 123rd Ave. SE, Kent, WA, 98031 next to a silver Subaru hatchback. The light blue Acura
17 is registered to "**Dai TRAN**" at 8336 39th Ave. S., Seattle, WA 98118, and is familiar to
18 investigators as it has been observed, since August 2017, parked on a daily basis
19 previously at 8336 39th Ave. S., Seattle, WA and **Subject Residence 2**. The silver Subaru
20 hatchback is also familiar to investigators as it has been observed, on numerous
21 occasions, parked at **Subject Residence 2** and is driven by an unidentified Asian female
22 believed to be **Dai Thanh TRAN**'s girlfriend. Investigators believe that **Dai Thanh**
23 **TRAN** has relocated from **Subject Residence 2** to 21739 123rd Ave. SE, Kent, WA,
24 98031.

25 74. On October 8, 2018, after assisting **Dai Thanh TRAN** in moving to 21739
26 123rd Ave. SE, Kent, WA, 98031, **Truc TRAN** returned to **Subject Residence 2** in **TV-4**
27 at approximately 6:01 PM and departed again in **TV-4** at 6:51 PM. According to the GPS
28 tracking device installed on **TV-4**, **Truc TRAN** drove from **Subject Residence 2** to

1 Great American Casino. Later the same evening, I observed **TV-8** returning to **Subject**
2 **Residence 2** at 11:22 PM and **TV-4** returning to **Subject Residence 2** at approximately
3 11:35 PM, where both vehicles remained parked overnight.

4 **K. Hoan Thai TRAN Telephone Contact with Subject Residence 2 Suspects and**
5 **Kiet TRAN**

6 75. On September 24, 2018, I reviewed toll records associated with two AT&T
7 Wireless telephone numbers subscribed to **Hoan Thai TRAN**, (206) 474-4038 and
8 (425) 306-1791. Toll records indicate that these two phone numbers subscribed to **Hoan**
9 **Thai TRAN** have frequently been in contact with multiple phone numbers associated
10 with individuals residing or previously residing at 8336 39th Ave. S., Seattle, WA (now
11 residing at **Subject Residence 2**). It should be noted that the number of contacts
12 referenced below are approximate, not exact, and are based on toll records obtained from
13 service providers. As previously indicated, **Thanh Thao Chi THANH** and Hung HONG
14 were previously residents at 8336 39th Ave. S., Seattle, WA and relocated to **Subject**
15 **Residence 2**.

16 76. Toll records indicate that the telephone number (206) 474-4038, subscribed
17 to **Hoan Thai TRAN**, contacted a telephone number subscribed to **Thanh Thao Chi**
18 **THANH** on up to 20 occasions between December 2016 and March 2017. In addition,
19 the same telephone number contacted a telephone number subscribed to Hung HONG on
20 up to 29 occasions. Telephone number (206) 474-4038 no longer appears to be active, as
21 tolls do not indicate any activity as of June 2017. Telephone number (425) 306-1791,
22 subscribed to **Hoan Thai TRAN** and believed to be his current primary telephone
23 number, made contact with Hung HONG on up to 23 occasions between July 2017 and
24 September 2017. Toll records also indicate that **Hoan Thai TRAN** is currently in contact
25 with multiple pre-paid or "burner" cell phone numbers with Seattle area codes. I know
26 through my training and experience that it is common for individuals engaged in
27 narcotics trafficking to communicate using prepaid cellular phones which are more
28 difficult for law enforcement to identify and track.

1 77. **Hoan Thai TRAN**'s toll records also indicate that he was in frequent
2 contact with T-Mobile telephone number (952) 885-2541 during the time it was
3 subscribed to Kiet TRAN in Minnetonka, Minnesota. Between December 29, 2016 and
4 May 9, 2017, **Hoan Thai TRAN**'s telephone number (206) 474-4038 made contact on up
5 to 417 occasions with Kiet Huy TRAN's telephone number (952) 855-2541. Between
6 May 9, 2017 and September 2017, **Hoan Thai TRAN**'s telephone number (425) 306-
7 1791 made contact with Kiet Huy TRAN's T-Mobile telephone number on up to 170
8 occasions. **Hoan Thai TRAN**'s telephone number (425) 306-1791 has recently been in
9 contact with T-Mobile prepaid Minnesota telephone number (612) 404-8782 on up to 236
10 occasions beginning in September 2017 and as recently as July 6, 2018. Telephone
11 number (612) 404-8782 is the same telephone number listed as 'Daddy' in Kiet TRAN's
12 wife's cellular phone on June 11, 2018. Based on the title of the contact, frequency of
13 calls in Anh H. NGUYEN's phone and contact with **Hoan Thai TRAN**'s telephone
14 number (425) 306-1791 (beginning immediately after his previous number became
15 inactive), investigators believe this telephone number is likely being used by Kiet TRAN.
16 Through my training and experience I know it is common for individuals engaged in
17 narcotics trafficking to change or "drop" cellular phones after being contacted by law
18 enforcement officers. Further, **Hoan Thai TRAN**'s telephone number (425) 306-1791
19 has communicated with multiple additional numbers or "burner" cell phones subscribed
20 to individuals in Minnesota.

21 **L. Hoan Thai TRAN (TV-1) and Wilson TRUONG (TV-2) at Subject**
22 **Residence 1 and Subject Residence 3**

23 78. During the course of this investigation, agents have identified **Wilson**
24 **TRUONG** as an associate who has frequent contact with **Hoan Thai TRAN** and has
25 been observed, on multiple occasions, driving **TV-2** at two residences inhabited by **Hoan**
26 **Thai TRAN**. Agents believe that each of **Hoan Thai TRAN**'s previous and current
27 residences previously contained clandestine marijuana grow operations operated by
28 **Hoan Thai TRAN, Wilson TRUONG**, and their associates. Further, agents believe that

1 **Wilson TRUONG** was previously operating a clandestine marijuana grow operation at
2 his previous residence located at 4908 13th Ave. S., Seattle, WA 98108. On or near
3 January 2, 2018, **Wilson TRUONG** began living at a new residence located at 27634
4 123rd Ave. SE, Kent, WA 98030 (hereafter referred to as **Subject Residence 3**). Regular
5 physical surveillance, data produced by a judicially authorized GPS tracking device
6 previously installed on **TV-2**, and data previously produced by a judicially authorized
7 tracking warrant activated on **Wilson TRUONG**'s cellular phone indicate that **Wilson**
8 **TRUONG** departs from **Subject Residence 3** nearly every morning and returns to
9 **Subject Residence 3** in the evenings. As recently as September 27, 2018, investigators
10 have observed **Wilson TRUONG** driving **TV-2** and returning to **Subject Residence 3**.
11 As recently as October 8, 2018, investigators observed **TV-2** parked in the driveway of
12 **Subject Residence 3**. Based on surveillance, odor and power records associated with
13 this address, investigators believe that **Wilson TRUONG** is currently operating a
14 clandestine marijuana grow operation at **Subject Residence 3**.

15 79. Investigators have observed **Wilson TRUONG**, driving **TV-2**, meeting
16 with **Hoan Thai TRAN** at **Hoan Thai TRAN**'s previous residence (and the address
17 **Hoan Thai TRAN** continues to provide to USPS according to employment records),
18 7433 48th Ave. S. Seattle, WA 98118 on October 16, 2016, January 24, 2017, January
19 31, 2017, May 15, 2017 and May 22, 2017. The first time **TV-2** was observed at 7433
20 48th Ave. S., Seattle, WA, it was bearing the California license plate of 7FUW987,
21 registered to **Wilson TRUONG** at 4911 Iowa Ave, Sacramento, CA, 95823. **TV-2** now
22 bears a Washington State license plate and is registered to **Wilson TRUONG** at 16626
23 126th Ave SE, Renton, WA, though it does not appear that **Wilson TRUONG** resides at
24 that address.

25 80. On October 5, 2017, with the aid of a judicially authorized GPS tracking
26 device, investigators conducted surveillance of **Hoan Thai TRAN** and **TV-1** at his
27 residence, **Subject Residence 1**. At approximately 6:00 PM, **Hoan Thai TRAN** returned
28 to his residence from work at the Issaquah Post Office. At approximately 6:32 PM,

1 **Wilson TRUONG** arrived at **Subject Residence 1** driving **TV-2**. **Wilson TRUONG**
2 backed **TV-2** up in the driveway of **Subject Residence 1** to the garage door of the
3 residence, which was then partially opened. At approximately 7:29 PM, **Wilson**
4 **TRUONG** left **Hoan Thai TRAN**'s residence and traveled to a residence located at 4908
5 13th Ave. S., Seattle, WA.

6 81. Upon arriving at 4908 13th Ave. S., Seattle, WA, investigators observed
7 **Wilson TROUNG** exit **TV-2** and remove a large yard waste bag and backpack from the
8 back of the minivan. **Wilson TRUONG** then walked up to the front door of the residence
9 with the yard waste bag and backpack, opening the security screen door then the front
10 door. The yard waste bag appeared to be full, bulky and heavy, causing **Wilson**
11 **TRUONG** to have to back into the residence, holding open the security screen door.
12 Investigators also observed approximately 15-20 large bags of potting soil stacked along
13 the walkway that led to the front door.

14 82. On October 26, 2017, investigators again conducted surveillance of **Hoan**
15 **Thai TRAN** at his residence located at **Subject Residence 1**. At approximately 6:42 PM,
16 **Hoan Thai TRAN** arrived at his residence in **TV-1**. Detective Przygocki observed **TV-2**
17 parked in the driveway of **Hoan Thai TRAN**'s residence, again backed up to the closed
18 garage door. At approximately 7:07 PM, Detective Przygocki observed multiple
19 individuals, including **Hoan Thai TRAN** bending over to step under a partially opened
20 garage door to access **TV-2**. At approximately 7:11 PM, **TV-2** departed with two
21 individuals, driver and passenger, in the vehicle. Investigators followed **TV-2** to 4908
22 13th Ave. S., Seattle, WA. Upon arriving at 4908 13th Ave. S., Seattle, WA, investigators
23 observed **Wilson TROUNG** exit the vehicle. The female passenger, later identified as
24 **Wilson TRUONG**'s wife, **Zhiyu LIU**, also exited, carrying a laundry basket that
25 appeared to be stacked high with laundry and the two entered the residence. At
26 approximately 7:35 PM, Detective Przygocki walked past the residence and identified the
27 odor of live marijuana plants emanating from the residence.

83. According to surveillance and data produced by the GPS tracking device previously affixed to **TV-2** and regular surveillance, **Wilson TRUONG** was first visiting and then relocated entirely to **Subject Residence 3** as of January 2, 2018. On January 2, 2018, investigators were conducting surveillance at **Subject Residence 3**, where investigators observed the Honda Odyssey minivan parked in the driveway. At approximately 2:45 PM, TFO Klokow observed **Wilson TRUONG** and an Asian female matching the driver's license photo of **Wilson TRUONG's** wife, **Zhiyu LIU**, arrive at the residence, in a 2016 dark blue Honda sedan bearing Washington license plate BCM3395, registered to **Zhiyu LIU**. At approximately 3:51 PM, TFO Klokow continued surveillance on foot. As he walked past the residence and **TV-2**, TFO Klokow reported that he detected the odor of growing marijuana plants emanating from **Subject Residence 3**. TFO Klokow has been employed by the King County Sheriff's Department since 1990 and has extensive training and experience investigating narcotics trafficking and clandestine marijuana growing operations and is able to discern between the odor of burning marijuana and growing marijuana.

M. Surveillance of Wilson TRUONG and TV-2 at Totem Self- Storage Unit #347

84. Based on my review of data produced by a judicially authorized GPS tracking device previously affixed to **TV-2**, I noted stops at Totem Self Storage located at 8838 S 228th ST, Kent, Washington, 98031, on at least six occasions between February 22, 2018 and May 14, 2018. On March 22, 2018 TFO Klokow, Tukwila Police Detective James Sturgill and I met with Totem Self Storage Management regarding unit(s) held by **Wilson TROUNG**. Management provided records showing a 5 foot by 10 foot storage unit, #347, was rented by **Wilson TROUNG** on February 22nd, 2018. The application listed **Wilson TROUNG's** address as 16626 126th Avenue SE, Renton, 98058. A photocopy of **Wilson TROUNG's** Washington State Driver's license was included in the file. The application also listed a telephone number of (253) 507-0186. This telephone number is a prepaid telephone number with no available subscriber information, however, it is also listed as **Wilson TRUONG's** contact phone number on his Puget

1 Sound Energy (PSE) account for his current home address in Kent, WA as of May 23,
2 2018. According to Totem Self Storage records, Totem Self- Storage Unit #347 has been
3 accessed on eight occasions between February 22, 2018 and July 24, 2018. The manager
4 also told investigators that he/she was present when **Wilson TRUONG** completed his
5 application to rent the storage unit on February 22, 2018. He/she stated that **Wilson**
6 **TRUONG** appeared to speak very little English and had a companion by the name of
7 "LEE" to assist him. The manager stated that he/she recalled LEE smelling "really bad
8 like marijuana" while he was present in the lobby area. A review of Totem Self-Storage
9 records confirms that the manager signed and approved **Wilson TRUONG's** application.

10 85. On March 22, 2018, May 29, 2018, and July 17, 2018, the manager of the
11 storage facility consented to the execution of a K9 Sniff in the outer hallway of the
12 building (Building D) that housed **Wilson TROUNG's** unit, #347. On each occasion,
13 Detective Sturgill deployed his K9 partner "Apollo," a narcotics detection dog, who
14 began working from the north end of the hallway systematically past each unit door.
15 When Apollo reached unit 347, he sat indicating that Apollo had detected odors of
16 narcotics emanating from under and to each side of the door on unit 347.

17 86. On multiple occasions, I reviewed surveillance footage recorded by a
18 security camera monitoring the driveways at Totem Self-Storage and observed Wilson
19 TRUONG driving **TV-2**. I also observed Wilson TRUONG loading large cardboard
20 boxes in and out of **TV-2** prior to and after accessing unit 347. I also reviewed
21 surveillance video recorded in the open hallway outside Wilson TRUONG's storage unit
22 and observed him using a hand truck to roll the same large cardboard boxes in and out of
23 the unit and in and out of **TV-2**.

24 **N. Wilson TRUONG GPS Tracking Device Removal from TV-2**

25 87. On the evening of May 14, 2018, TFO Klokow, USPS Office of Inspector
26 General (OIG) Special Agent Snyder, other law enforcement officers and I were
27 conducting surveillance at **Subject Residence 2**. At approximately 7:45 PM, I received
28

1 multiple tamper alert e-mails associated with **Wilson TRUONG's** vehicle **TV-2**, which
2 are sent automatically when a GPS tracking device is removed or tampered with. The
3 other agents and I travelled nearby to Othello and Martin Luther King Jr. Way and
4 observed **Wilson TRUONG** sitting still in **TV-2** in the parking lot. After a few moments,
5 I observed **Wilson TRUONG** walk from his vehicle into the Safeway located in the same
6 parking lot. Special Agent Snyder entered Safeway behind **Wilson TRUONG** and
7 observed him standing alone near the fruits and vegetables section of the store. Special
8 Agent Snyder observed **Wilson TRUONG** speak briefly with another individual near the
9 store exit and I watched as he exited Safeway, returned to **TV-2** and drove away. Agents
10 followed **TV-2** out of the parking lot at Othello and Martin Luther King Jr. Way and
11 travelled northbound on Martin Luther King Jr. Way. **Wilson TRUONG** was observed
12 pulling into another shopping center on the northeast corner of Graham Street and Martin
13 Luther King Jr. Way. There, **Wilson TRUONG** was observed sitting in **TV-2**, meeting
14 with a gold Dodge minivan, bearing Washington license plate AWS5852, registered to
15 Vinh DANG. On May 15, 2017, TFO Klokow retrieved the GPS tracking device
16 previously affixed to **TV-2** from a dumpster in the same Safeway parking lot where
17 investigators observed **Wilson TRUONG** and **TV-2** on May 14, 2018. **TV-2** has since
18 been regularly observed during surveillance operations parked at **Subject Residence 3** on
19 May 15, 2018 and as recently as October 8, 2018.

20 88. On May 23, 2018, TFO Klokow and I conducted surveillance at **Subject**
21 **Residence 3**. **TV-2** was not parked in the driveway at this time, however a navy blue
22 Honda sedan bearing WA license plate BCM3395, registered to **Wilson TRUONG's**
23 wife, **Zhiyu LIU** was parked in the driveway. At approximately 4:45 PM, TFO Klokow
24 walked past **Subject Residence 3** and observed that all of the curtains, doors and
25 windows of the residence appeared to be covered and closed, aside from a small upstairs
26 window. TFO Klokow was not able to detect the odor of marijuana emanating from the
27 residence, however, I know through my training and experience investigating subjects in
28 this case that individuals operating clandestine marijuana grows go to great lengths to

1 create elaborate and efficient filtration systems to reduce the odor of growing marijuana
2 and avoid law enforcement detection.

3 89. On July 12, 2018, TFO Klokow, Special Agent Snyder and Internal
4 Revenue Service Criminal Investigations (IRS-CI) Special Agent Scott Dresch and I
5 conducted surveillance of **Wilson TRUONG** driving **TV-2**. At approximately 2:30 PM,
6 investigators observed **Wilson TRUONG** departing what investigators believe to be his
7 place of employment, "Gate Gourmet" located at 2755 South 163rd Street, Seattle, WA
8 98158, alone in **TV-2**. Investigators followed **Wilson TRUONG** to Wells Fargo Bank
9 located at 355 S Grady Way, Renton, WA 98057, where he utilized the drive-through
10 window from approximately 3:05 PM-3:07 PM. After leaving Wells Fargo, investigators
11 continued to follow **Wilson TRUONG** and **TV-2** to Rain City Hydro, located at 301
12 Airport Way, Renton, WA 98057. At approximately 3:18 PM, I observed and
13 photographed **Wilson TRUONG** exiting the loading dock at Rain City Hydro followed
14 by an unknown Asian male pushing a large cart containing a large cardboard box. I
15 observed **Wilson TRUONG** opening the rear gate of **TV-2** and saw the unknown Asian
16 male load the box into the vehicle. **Wilson TRUONG** closed the rear gate of **TV-2** and
17 waived to the unknown Asian male who walked back inside Rain City Hydro. **Wilson**
18 **TRUONG** returned to the driver's side of **TV-2** and drove away. I know through my
19 training and experience investigating clandestine marijuana grow operations that Rain
20 City Hydro is an indoor garden and hydroponic store which carries nearly all the supplies
21 necessary to initiate and maintain large marijuana grow operations including specialized
22 lighting, sophisticated electrical equipment, chemical fertilizers and soil. Rain City Hydro
23 is familiar to law enforcement personnel due to the number of individuals frequenting the
24 business who have been contacted by law enforcement for operating large, illegal
25 clandestine marijuana grows. One review of the business, posted on Yelp.com reads
26 "Rain City is fine if your grow operation is huge but for individuals, it doesn't really
27 work..." Investigators were unable to follow **Wilson TRUONG** in **TV-2** away from Rain
28 City Hydro, but continued surveillance at **Subject Residence 3**. At approximately 4:21

1 PM, investigators observed **Wilson TRUONG** arrive at **Subject Residence 3** in **TV-2**.
2 TFO Klokow observed and photographed **Wilson TRUONG** retrieving a white plastic
3 garbage bag from the sliding door of his vehicle and carry the plastic bag inside **Subject**
4 **Residence 3**. I know through my training and experience that individuals engaged in
5 narcotics trafficking often package their product in plastic bags before and after making
6 any kind of transaction with the narcotics or simply to transport their product from one
7 location to another for packaging or other distribution purposes.

8 90. On July 13, 2018, at approximately 4:47 AM, TFO Klokow began
9 conducting surveillance at **Subject Residence 3**. He observed two vehicles parked in the
10 driveway of the residence, including **TV-2** as well as a new maroon colored Acura SUV
11 with Acura of Seattle dealership plates. At approximately 5:17 AM, TFO Klokow
12 observed **Wilson TRUONG** exit **Subject Residence 3** and enter **TV-2** alone. At
13 approximately 5:19 AM, TFO Klokow observed **Wilson TRUONG** drive away. Since
14 July 13, 2018 and as recently as October 2, 2018, TFO Klokow has continued to observe
15 the new maroon Acura SUV at **Subject Residence 3** in the early morning hours. This
16 vehicle now bears Washington license plate BKT5428 and according to Washington
17 DOL, is registered to **Zhiyu LIU** at 16626 126th Ave. SE, Renton, WA 98058.

18 91. On September 27, 2018, TFO Klokow, SA Dresch and I conducted
19 surveillance of **Wilson TRUONG** and **TV-2** at his place of employment "Gate
20 Gourmet," located at 2755 South 163rd St., Seattle, WA 98158. At approximately 3:05
21 PM, investigators observed **Wilson TRUONG** driving **TV-2**, exiting the Gate Gourmet
22 employee parking lot. Investigators followed **TV-2** to a Safeway, which contains a Wells
23 Fargo bank branch, located at 4011 S. 164th St., Seattle, WA 98188. TFO Klokow
24 observed **Wilson TRUONG** enter the store at approximately 3:15 PM, then exit the store
25 and return to his vehicle carrying nothing in his hands at approximately 3:32 PM. After
26 departing Safeway / Wells Fargo, investigators followed **TV-2** directly to Rain City
27 Hydro located at 301 Airport Way, Renton, WA 98057. As previously described, Rain
28 City Hydro is an indoor garden and hydroponics equipment store. **Wilson TRUONG**

1 arrived at approximately 3:50 PM and departed at approximately 3:57 PM. While at Rain
2 City Hydro, **TV-2** was backed directly into the loading dock for the business. From Rain
3 City Hydro, investigators continued to follow **TV-2** back to **Subject Residence 3**.

4 **Wilson TRUONG** arrived at **Subject Residence 3** at approximately 4:35 PM and was
5 observed by TFO Klokow carrying large white bags from the rear of **TV-2** into the
6 residence.

7 92. On September 24, 2018, I reviewed power records provided by PSE,
8 associated with **Subject Residence 3**. The account holder is listed as **Wilson TRUONG**,
9 who provided PSE with the same telephone number he provided to Totem Self-Storage,
10 (253) 507-0186. According to available toll records, this telephone number has been in
11 contact with **Hoan Thai TRAN** on approximately 212 occasions from June 5, 2017
12 through September 16, 2018. According to PSE, the reading on the meter assigned to
13 **Subject Residence 3** has been abnormally high since October 2017. **Wilson TRUONG**
14 became the PSE subscriber for **Subject Residence 3** on August 16, 2017 and moved into
15 the residence in January 2018. I know through my training and experience that it takes a
16 substantial amount of time, effort and financing to initiate a marijuana grow operation.

17 93. The most recent formal billing statement for **Subject Residence 3** was
18 issued on July 3, 2018 and usage measured at 8,748 KWH just for the billing period June
19 5, 2018 to July 3, 2018 resulting in a charge of \$970.52 for 29 days of service during a
20 summer month. The usage measured during the same time period from June 6, 2017 to
21 July 5, 2017, prior to **Wilson TRUONG** and **Zhiyu LIU**'s occupancy, measured at 114
22 KWH, resulting in a charge of \$19.73. I know through my training and experience that
23 residences consuming an abnormal level of power are often clandestine marijuana grow
24 operations. A more current billing statement has been delayed and is not currently
25 available according to PSE due to the extremely high rate of power consumption, which
26 necessitates a physical visit by a PSE employee to read and confirm the meter. PSE was
27 able to provide records detailing daily usage through September 16, 2018, for the past
28 100 days, which continue to reflect extremely high daily usage of 188.7 KWH to 369.22

1 KWH per day. Given the extremely high rate of power consumption at **Subject**
2 **Residence 3**, investigators believe that **Wilson TRUONG's** residence continues to
3 contain a substantial clandestine marijuana grow operation.

4 94. On September 24, 2018, I reviewed toll records associated with two AT&T
5 Wireless telephone numbers subscribed to **Hoan Thai TRAN**, (206) 474-4038 and (425)
6 306-1791. Toll records indicate that these two phone numbers subscribed to **Hoan Thai**
7 **TRAN** have frequently been in contact with multiple phone numbers associated with
8 **Wilson TRUONG**. Between December 2016 and May 2017, telephone number (206)
9 474-4038, subscribed to **Hoan Thai TRAN** was in contact with (206) 370-0288,
10 subscribed to **Wilson TRUONG** on approximately 188 occasions. According to toll
11 records, between May 2017 and September 2018, **Hoan Thai TRAN's** current telephone
12 number, (425) 306-1791, has been in regular contact with **Wilson TRUONG's** telephone
13 number (206) 370-0288 on approximately 190 occasions, as recently as September 2,
14 2018.

15 **O. Financial Records Associated with Wilson TRUONG and Zhiyu LIU**

16 95. I have also reviewed a summary of financial records associated with
17 **Wilson TRUONG** and **Zhiyu LIU**. Investigators believe that **Wilson TRUONG** and
18 **Zhiyu LIU** were previously residents of California and relocated to Washington State in
19 early 2017. Prior to their move to Washington, transaction records indicate that either
20 **Wilson TRUONG** or **Zhiyu LIU** were in the state, leading investigators to believe that
21 **Wilson TRUONG** has been engaged in trafficking marijuana in the state of Washington
22 for several years. For example, in November of 2015 several purchases were made using
23 a Wells Fargo debit card in Tukwila, WA. On September 10, 2016, two purchases were
24 made from the same Wells Fargo Account at Rain City Hydro in Kent, Washington,
25 following by a \$2,000 cash withdrawal in Tacoma two days later. A comparison of cash
26 deposits in all accounts reviewed for the period of 2015-2018 revealed deposit activity
27 increased significantly at the beginning of 2017. In total, over \$120,000 in unexplained
28

1 cash was deposited to accounts associated with **Wilson TRUONG** and **Zhiyu LIU**;
2 \$59,800, or approximately half of that amount, was deposited from January to October of
3 2017. The timing of this increase in cash is consistent with **Wilson TROUNG** and
4 **Zhiyu LIU**'s move from California to Washington State and involvement with marijuana
5 growing.

6 96. I also reviewed available Federal Income Tax Returns associated with
7 **Wilson TRUONG** and **Zhiyu LIU** for the period of 2014-2017. **Zhiyu LIU** did not file
8 Federal Income Tax Returns for tax year 2014. **Zhiyu LIU** and **Wilson TRUONG** filed
9 joint income tax returns for tax years 2015 through 2017. The following table
10 summarized the information contained on those returns:

Tax Year	Wages	Other Income (gross amount)
2014 (Truong)	\$0	\$6,000 ⁷
2015	\$3,750 ⁸	\$7,800
2016	\$3,125	\$19,500 ⁹
2017	\$0	\$23,200 ¹⁰

16 97. A comparison of tax return information and bank account deposits shows
17 the following:

Year:	Tax Return Gross Income:	Total Gross Deposits to Accounts:	Total Cash Deposits:
2014	\$6,000	Unknown	unknown
2015	\$11,550	\$43,527.50	\$29,920 (69%)
2016	\$22,625	\$34,106.02	\$30,365 (89%)
2017	\$23,200	\$68,974.96	\$59,800 (87%)

24 ⁷ A Schedule C was filed for income as a handyman.

25 ⁸ **Wilson TRUONG**: AA Tasty Kitchen

26 ⁹ Two Schedule Cs were filed: **Wilson TRUONG** \$4,000 and **Zhiyu LIU** \$15,500. No business or profession was listed on either form.

27 ¹⁰ Cash Received from Cleaning \$11,500, **Zhiyu LIU** for massage, \$4,000 from Evergreen Spa, \$2,700 from Leena Massage, and \$5,000 from J&B LLC. All of **Zhiyu LIU**'s income was reported on Schedule C worksheets as sole proprietorships, however a search of businesses in the WA Secretary of State's public website did not reveal any businesses associated with either **Wilson TRUONG** or **Zhiyu LIU**. The address listed for J&B LLC was 29012
28 121st Way SE, Auburn, WA which is a single-family residence, not a business location.

1
2 98. As shown above, the total deposit amounts to known bank accounts for
3 Wilson TRUONG and Zhiyu LIU is well in excess of the reported gross revenue amount
4 reported on Federal Income Tax Returns. In fact, the cash deposits alone are greater than
5 the gross revenue amounts. During 2017, surveillance did not find Wilson TRUONG
6 going to any business location or place of employment, but rather observed him at
7 suspected marijuana grow locations. Wilson TRUONG's stated income of \$11,500 was
8 reported as "other income", not as business income on the tax returns. No other
9 description or expenses were provided on the returns. It is likely that Wilson TRUONG
10 and Zhiyu LIU included this amount as "income" in order to make it appear he was
11 employed and to disguise his true source of income from growing marijuana. According
12 to data provided by the GPS tracking device previously affixed to TV-2 and surveillance
13 as recently as September 27, 2018, investigators believe that Wilson TRUONG became
14 employed at "Gate Gourmet" only recently in 2018. Records indicate that he travels to
15 that location from approximately 5:30 AM – 2:30 PM, four to five days per week.

16 **Q. Surveillance of Hoan Thai TRAN at 6016 44th Ave. S., Seattle, WA, Subject**
17 **Residence 4, Residence of Huy HA and Nghi Phuong CHAU**

18 99. According to physical and electronic surveillance as well as data produced
19 by the GPS tracker affixed to **TV-1, Hoan Thai TRAN's** vehicle has frequented a
20 residence located at 6016 44th Ave. S., Seattle, WA 98118 (**Subject Residence 4**) on at
21 least 29 occasions since May 22, 2017, as recently as October 3, 2018.

22 100. Distant surveillance video recorded at the residence on May 31, July 6, July
23 13, September 5, September 10, September 13, September 14, September 15, 2018 and
24 October 1, 2018 reflects **TV-1** and/or **Hoan Thai TRAN** arriving and departing **Subject**
25 **Residence 4** at specific times that match the data produced by the GPS tracking device
26 affixed to **TV 1**. Distant surveillance video recorded on July 13, 2018 reflects a light
27 colored Lexus SUV, matching the appearance of **TV-1**, arriving and parking across the
28 street from **Subject Residence 4** from 9:47 PM to 9:52 PM, the exact time frame

1 indicated by the GPS tracking device affixed to **TV-1**. It is common for investigators to
2 observe individuals frequenting **Subject Residence 4**, parking across the street or around
3 the corner from the residence and approaching the residence on foot. I know through my
4 training and experience that it is common for individuals engaged in narcotics trafficking
5 to engage in evasive behavior to avoid law enforcement surveillance and detection. Since
6 July 11, 2017, Investigators have observed and identified, by comparison to Driver's
7 License photos, an Asian male, **Huy HA**, and an Asian female, **Nghi Phuong CHAU**,
8 among others identified and unidentified residing at 6016 44th Ave. S., Seattle, WA.

9 101. On February 14, 2018, USPS Priority Mail parcel 9505 5148 7911 8043
10 2043 65, hereafter referred to as Parcel 2043 65, was referred to the U.S. Postal
11 Inspection Service for further investigation by employees at the Columbia Post Office in
12 Seattle, WA, due to the suspected odor of marijuana emanating from the parcel. Postal
13 Inspectors regularly investigate Express and/or Priority Mail parcels and envelopes
14 possibly containing narcotics and/or monetary proceeds derived from illegal drug
15 trafficking activity. The parcel was addressed to "Thuan Tran, 310 Shawnee Trail,
16 Shakopee, MN 55379" from "Loi Chen, 8227 16th Ave. S., Seattle, WA." I found both
17 addresses to be true and deliverable, however, no individuals by either name are listed at
18 the respective addresses. I presented Parcel 2043 65 to a narcotics detection canine, who
19 alerted to the odor of narcotics on February 15, 2018. I then applied for and obtained
20 Federal Search Warrant MJ18-073 on February 21, 2018. Parcel 2043 65 was found to
21 contain 2,970.3 grams of green leafy substance suspected to be marijuana packaged in
22 heat and vacuum sealed bags.

23 102. On February 15, 2018, I reviewed surveillance video captured at Columbia
24 Post Office on the date and time Parcel 2043 65 was shipped, February 12, 2018. I
25 captured photos of a heavy set middle-aged Asian male carrying Parcel 2043 65 from a
26 gold colored older Honda Sedan with a sun roof and visible rims matching those of **TV-5**
27 into the Post Office. I also noted that the suspect's vehicle had a bright blue disabled
28 parking pass hanging from the visor. I also captured close-up photos of the Asian male

1 standing at the retail counter shipping Parcel 2043 65. The individual looked familiar to
2 me and as I continued my investigation in this case and others, I retained those photos
3 hoping to identify the shipper at a later date.

4 103. On July 17, 2018, I compared the photos I captured from February 12, 2018
5 of the individual shipping Parcel 2043 65 to still images captured between June 21, 2018
6 and July 3, 2018 at **Subject Residence 4** and found that both sets of photos match the
7 appearance of **Huy HA**'s Washington DOL photo. Further, according to Washington
8 State DOL records, one of the vehicles registered to **Huy HA** is a 1999 Honda Sedan,
9 gold in color, bearing WA license plate ARZ4584 (**TV-5**). **TV-5** is registered at 18816
10 113th Way SE Renton, WA 98055, however, it has been observed parked at **Subject**
11 **Residence 4** on nearly every occasion investigators have conducted surveillance since
12 investigators first became aware of **Subject Residence 4** in July 2017. As recently as
13 October 8, 2018, I observed **TV-5** parked on the street in front of **Subject Residence 4**. I
14 captured still images of **Huy HA** approaching and/or exiting his 1999 gold Honda sedan
15 from surveillance video recorded at **Subject Residence 4** as recently as October 2, 2018.
16 **TV-5**'s appearance matches those in the photos saved from the February 12, 2018
17 shipment of Parcel 2043 65. The make, model, color and year of **TV-5** are consistent with
18 the vehicle observed in the captured footage, as are the rims and sun roof on the vehicle.
19 Further, in all the recently captured photos of **TV-5** parked at **Subject Residence 4**, a
20 bright blue disabled parking pass can be seen displayed from the front visor.

21 104. On March 9, 2018, TFO Klokow and I conducted surveillance at **Subject**
22 **Residence 4**. At approximately, 2:58 PM, I was walking northbound on foot past the
23 residence and clearly detected the odor of growing marijuana and the extremely strong
24 odor of dryer sheets emanating from the residence. Through my training and experience
25 searching and dismantling marijuana grow operations and searching and seizing
26 marijuana from the U.S. Mail, I am familiar with the difference between the odor of live
27 marijuana plants and dried, finished marijuana product. Investigators also observed that
28 all of the doors and windows at the residence were covered completely with fabric and

1 other materials, which I know to be a common tactic among individuals operating
2 clandestine marijuana grows to avoid suspicion from neighboring residents and/or law
3 enforcement detection.

4 105. On June 21, 2018, at approximately 1:05 PM, SA Dresch and I conducted
5 surveillance at **Subject Residence 4**. First I, then SA Dresch walked past the residence
6 and were unable to detect the odor of marijuana from the street; however, as previously
7 stated, I know through my training and experience investigating subjects in this case that
8 individuals operating clandestine marijuana grows go to great lengths to create elaborate
9 and efficient filtration systems to reduce the odor of growing marijuana and avoid law
10 enforcement detection. I also know that it is common for individuals operating
11 clandestine marijuana grow operations to open windows and ventilate residences or
12 buildings at night time, when there is less of a chance that someone on the street may
13 notice the odor. I noticed a large black plastic water barrel sitting in the front yard, which
14 is an item I know to be commonly associated with marijuana grow operations. I noted
15 that all of the doors and windows of the residence were covered with curtains or fabric.

16 106. On September 25, 2018, I reviewed the most recently available power
17 records provided by SCL associated with **Subject Residence 4**. The subscriber on the
18 account is **Nghi Phuong CHAU**, an Asian female investigators have identified as another
19 resident at **Subject Residence 4**, and believed to be the wife of **Huy HA**. **Nghi Phuong**
20 **CHAU's** account has been active at this residence since April 25, 1997. For the period of
21 June 18, 2018 through August 17, 2018, the total consumption was 11,689 KW, resulting
22 in a billing amount of \$1,527.32 for 60 days of power during summer months. Through
23 my training and experience, I know that it is common for individuals engaged in
24 trafficking marijuana outside the state of Washington to grow their own product and to
25 also collect product from multiple other individuals according to demand, rather than
26 attempt to grow and supply shipments on their own. Based on these high power records,
27 the odor of marijuana previously detected at this residence and the traffic at the residence,
28 investigators believe that individuals at **Subject Residence 4** maintain a moderate

1 marijuana grow operation at that location and also collect marijuana from other
2 individuals who stop briefly at the residence to make what appear to be pick-ups or drop-
3 offs. I further conclude that **Subject Residence 4** is likely to contain additional
4 documentary evidence of the residents' and other conspirators' involvement in the
5 criminal offenses listed above.

6 107. On September 25, 2018, I reviewed toll records associated with two
7 telephone numbers subscribed to **Hoan Thai TRAN**. Between June 4, 2017 and July 10,
8 2017, **Hoan Thai TRAN**'s telephone numbers, (425) 306-1791 and now disconnected
9 telephone number (206) 474-4038 were in contact with phone number (206) 992-6055, a
10 telephone number subscribed to **Huy HA** and **Nghi CHAU** according to records obtained
11 from AT&T Wireless on approximately 165 occasions. Between June 4, 2017 and
12 September 16, 2018, **Hoan Thai TRAN**'s telephone number (425) 306-1791 was in
13 contact with phone number (206) 992-6055, subscribed to **Huy HA**, per AT&T Wireless
14 on approximately 145 occasions.

15 108. On October 8, 2018, I reviewed surveillance video recorded at **Subject**
16 **Residence 4** on October 7, 2018. At approximately 10:32 AM, I observed a new
17 Chevrolet sedan park in front of **Subject Residence 4**. An Asian male exited the driver's
18 seat of the vehicle, put on a backpack and walked up the driveway of **Subject**
19 **Residence 4**. At approximately 11:04 AM, I observed the same individual exit the
20 driveway of **Subject Residence 4** still wearing the backpack, return to the Chevrolet
21 sedan and depart quickly. I observed a similar patter with at least two other sets of
22 vehicles and drivers at **Subject Residence 4** on October 8, 2018. As previously stated, I
23 know through my training and experience that it is common for individuals engaged in
24 narcotics trafficking to make brief "pick-up" or "drop-off" stops at residences used to
25 cultivate or store narcotics.

1 **Q. Hoan Thai TRAN, Mai Ngoc HUYNH and Minh NGO - 2017 Search of**
2 **Marijuana Grow on 61st Avenue South**

3 109. On June 7, 2017, investigators executed a King County Superior Court
4 search warrant and confirmed a clandestine marijuana grow located at 11402 61st Avenue
5 South, Seattle, Washington 98178. Data produced by the GPS tracker affixed to **TV-1**
6 places **Hoan Thai TRAN**'s vehicle at this address on at least ten occasions between May
7 4, 2017 and June 5, 2017. Inside the residence, investigators discovered 300 marijuana
8 plants and approximately 15 pounds of processed marijuana. Investigators also
9 discovered **Hoan Thai TRAN**'s home address (**Subject Residence 1**) written on a
10 calendar hung on a wall in the kitchen at 11402 61st Avenue South, Seattle, Washington
11 98178. The note on the back of the calendar was photographed at the time of discovery
12 and read specifically "15014-42nd Ave. S. Seattle WA.98188 Tukwila." After the
13 execution of the search warrant at 11402 61st Avenue South, Seattle, Washington 98178,
14 analysis of the GPS tracker affixed to **TV-1** indicated that **Hoan Thai TRAN**'s vehicle
15 returned to 11402 61st Avenue South, Seattle, Washington 98178 on at least eleven
16 occasions as recently as January 19, 2018.

17 110. During the search warrant, investigators discovered financial documents,
18 identification cards and personal effects identifying **Mai Ngoc HUYNH**, her husband
19 **Minh NGO**, and daughter Sutha NGO as residents of 11402 61st Ave. S., Seattle, WA
20 98178. As previously described, investigators identified a photo of a check in the name of
21 **Mai Ngoc HUYNH**, with listed address 11402 61st Ave. S., Seattle, WA in the photos
22 found on Kiet TRAN's cell phone during the June 11, 2018 search warrant at 1111
23 Horseshoe Ln SE, New Prague, MN 56071. Based on surveillance throughout this
24 investigation, and the image observed in Kiet TRAN's cell phone, investigators believe
25 that **Mai Ngoc HUYNH** is also conspiring with Kiet TRAN and **Hoan Thai TRAN** to
26 cultivate and transport marijuana out of the state of Washington to the State of Minnesota
27 and orchestrate payment for such activity in return.

1 111. A black Volvo sedan bearing WA license plate ATY1620, hereafter **TV-7**,
2 was observed parked in the driveway prior to and was present during the 2017 search
3 warrant execution at 11402 61st Ave. S., Seattle, WA. Regular surveillance confirms that
4 **Mai Ngoc HUYNH, Minh NGO** and **TV-7** have since relocated to Skylark Village
5 Estates located at 800 29th Street SE #G7, Auburn, WA 98002, hereafter **Subject**
6 **Residence 5**.

7 112. Investigators were familiar with the association between **Hoan Thai**
8 **TRAN, Mai Ngoc HUYNH** and **Minh NGO** based on 2017 surveillance operations at
9 **Hoan Thai TRAN's** previous residence, 7433 48th Ave. S., Seattle, WA 98118, where
10 investigators observed **Mai Ngoc HUYNH** and **Minh NGO** on multiple occasions
11 driving **TV-7**, previously registered to Minh Ngo at 11402 61st Ave. S., Seattle, WA. On
12 February 1, 2017, at approximately 4:43 PM, surveillance video recorded at 7433 48th
13 Ave. S., Seattle, WA 98118 recorded **Mai Ngoc HUYNH**, driving **TV-7**, meeting with
14 **Hoan Thai TRAN** in front of the residence. **Hoan Thai TRAN** was observed removing a
15 large cardboard box from the trunk of **TV-7** and taking it around the side of the residence
16 at 7433 48th Ave. S., Seattle, WA. The residence located at 7433 48th Ave. S., Seattle,
17 WA is of interest to this investigation because it is the previous residence of **Hoan Thai**
18 **TRAN** and is still listed on **Hoan Thai TRAN's** Washington State driver's license. The
19 property at 7433 48th Ave. S., Seattle, WA is currently owned by Thuy Thi TRAN, sister
20 of **Hoan Thai TRAN**. In addition, this is the address **Hoan Thai TRAN** continues to
21 provide as his home address to USPS management. According to surveillance and
22 analysis of the GPS tracking device, **Hoan Thai TRAN** frequents 7433 48th Ave. S.,
23 Seattle, WA in **TV-1** multiple times per week. Surveillance and analysis of the GPS
24 tracking device, however, indicate that he has not lived at this address since February
25 2017, when he and his wife, **Dung Ngoc LU** started spending every night at **Subject**
26 **Residence 1**. Further, surveillance and the GPS tracking device indicate that **TV-1** is
27 parked at **Subject Residence 1** nightly and that **Hoan Thai TRAN** departs from that
28 location nearly every morning to travel to work at the Issaquah Post Office.

1 113. On August 9, 2018, TFO Klokow, SA Snyder and SA Dresch were
2 conducting surveillance at the Issaquah Post Office, where **Hoan Thai TRAN** is
3 employed. According to SA Snyder, at approximately 4:27 PM, **Hoan Thai TRAN** drove
4 from the Issaquah Post Office to Cash Pawn America located at 415 Rainier Ave. N.,
5 Renton, WA, arriving at approximately 5:21 PM. **Hoan Thai TRAN** sat in his vehicle in
6 front of the business for approximately 15 minutes without exiting the vehicle or meeting
7 anyone in the parking lot. At approximately 5:36 PM, **Hoan Thai TRAN** relocated to an
8 Arco gas station located at 251 Rainier Ave. N, Renton, WA. At approximately 5:37 PM,
9 **Hoan Thai TRAN** was observed meeting with **Mai Ngoc HUYNH**, who was driving
10 **TV-7**. TFO Klokow observed **Hoan Thai TRAN** and **Mai Ngoc HUYNH** standing
11 together at the rear of **TV-1** and **TV-7** and noted that their interaction appeared to be
12 somewhat hostile. According to SA Snyder, each departed in their respective vehicles and
13 **Hoan Thai TRAN** drove **TV-1** directly home to his residence at **Subject Residence 1**.

14 114. On September 5, 2018, SA Snyder reviewed surveillance video recorded at
15 7433 48th Ave. S., Seattle, WA 98118. At approximately 4:40 PM, **Hoan Thai TRAN**
16 and **TV-1** were observed parked in front of the residence with an Asian female
17 recognized as **Mai Ngoc HUYNH** and a white minivan matching the make, model and
18 year of **TV-6**. **Mai Ngoc HUYNH** was observed retrieving a large black duffel bag from
19 the rear of the minivan believed to be **TV-6** and walking toward **Hoan Thai TRAN's**
20 vehicle. **Mai Ngoc HUYNH** returned to the minivan believed to be **TV-6** moments later,
21 empty-handed, with **Hoan Thai TRAN** following closely behind with his hands on her
22 shoulders. The two spoke for a few moments and departed in **TV-1** and **TV-6** shortly
23 thereafter. After meeting with **Mai Ngoc HUYNH**, **Hoan Thai TRAN** was observed
24 driving **TV-1** the same evening at **Subject Residence 4**, an address believed to be a
25 clandestine marijuana grow and collection/distribution point for **Hoan Thai TRAN** and
26 his associates.

1 **R. 800 29th Street SE #G7, Auburn, WA 98002 (Subject Residence 5) and 23040**
2 **SE 21st St., Sammamish, WA 98075 (Subject Residence 6)**

3 115. Since August 2, 2018 and as recently as September 27, 2018, investigators
4 have observed **T-6** and **TV-7** parked at the residence of **Mai Ngoc HUYNH** and **Minh**
5 **NGO** located at Skylark Village Estates located at 800 29th Street SE #G7, Auburn, WA
6 98002, hereafter referred to as **Subject Residence 5**. A judicially authorized GPS
7 tracking device affixed to **TV-6** confirms that the vehicle leaves **Subject Residence 5**
8 nearly every morning and returns to **Subject Residence 5** nearly every evening. Data
9 produced by the GPS tracking device affixed to **TV-6** indicates that **TV-6** was parked at
10 **Subject Residence 5** as recently as the evening of October 8, 2018. Surveillance
11 conducted by SA Snyder on October 8, 2018 also confirmed that both **TV-6** and **TV-7**
12 were parked at **Subject Residence 5** on the evening of October 8, 2018.

13 116. I have also reviewed a summary of financial records associated with **Mai**
14 **Ngoc HUYNH** and **Minh NGO**. A review of all known bank accounts and credit cards
15 maintained by **Mai Ngoc HUYNH** and **Minh NGO** revealed more than \$185,000 in cash
16 deposits from 2014 through 2017; a time period during which neither **HUYNH** nor **NGO**
17 had known legitimate income, according to Washington State Employment Security
18 records reviewed October 3, 2018. Records associated with one of Minh NGO's bank
19 accounts, Bank of America account ending in 4388, indicate that beginning in August
20 2017 and through at least January 2018, Minh NGO made payments to Skylark Village
21 Estates, LLC for **Subject Residence 5**. Personal checks associated with Bank of
22 America account 4388 in the name of Minh NGO and specifically referencing Trailer
23 #G7 (**Subject Residence 5**) have been used as recently as September 12, 2018 to make
24 payments on the account.

25 117. On October 4, 2018, I reviewed power records provided by PSE on
26 September 24, 2018, confirming that **Minh NGO** has been the subscriber on the PSE
27 account at **Subject Residence 5** since August 2017. The records provided by PSE are
28 specific to Skylark Village Estates Trailer #G7 (**Subject Residence 5**), as each unit in the

1 trailer park is individually billed for their usage. The personal checks referenced above,
2 in the name of **Minh NGO**, have the following address listed in the top left hand corner:
3 "**MINH NGO**, 800 29th ST SE TRLR G7, Auburn, WA 98002."

4 118. On August 2, 2018, TFO Klokow, SA Snyder, SA Dresch and I conducted
5 surveillance at **Subject Residence 5**, inside the Skylark Village Estates. At
6 approximately 9:09 AM, **TV-6** and **TV-7** were parked in the driveway of the residence.
7 At approximately 11:00 AM, investigators followed **Mai Ngoc HUYNH** and **Minh NGO**
8 from **Subject Residence 5** to a residence located at 23040 SE 21st St., Sammamish, WA
9 98075, hereafter referred to as **Subject Residence 6**. The house was large and appeared
10 unkempt and unoccupied. No other vehicles were observed in the driveway. The
11 residence was surrounded by a large chain-link fence with a gate accessing the roadway
12 onto 21st street.

13 119. Also on August 2, 2018, at approximately 12:28 PM, investigators
14 observed **TV-6** exit the driveway and gate at **Subject Residence 6**. **Minh NGO**, driving
15 **TV-6** took a right turn from SE 21st street onto 228th Ave. SE and then performed a U-
16 Turn at the intersection of SE 19th Pl and 228th Ave. SE. At approximately 12:30 PM,
17 King County Sheriff's Deputy Chris Sawtelle and King County Sheriff's Sergeant
18 Matthew Paul conducted a traffic stop and contacted the occupants of **TV-6**, who were
19 identified as **Mai Ngoc HUYNH** and **Minh NGO**. Both driver and passenger presented
20 Washington State identification cards indicating that they were both residents at 11402
21 61st Ave. S., Seattle, WA 98178. According to Deputy Sawtelle, the driver of the
22 vehicle, **Minh NGO** made an improper right hand turn off SE 21st street by crossing
23 directly over the right lane of traffic, in violation of 46.61.290, further the passenger of
24 the vehicle, **Mai Ngoc HUYNH**, was not wearing her seatbelt. The traffic stop lasted less
25 than ten minutes and **TV-6** was allowed to leave the area without further delay or
26 incident. Investigators continued surveillance of **TV-6** for a short period of time until
27 they were no longer able to follow the minivan in traffic on I-405 Southbound.

28 Investigators returned to the residence of **Mai Ngoc HUYNH** and **Minh NGO**, **Subject**

1 **Residence 5.** At approximately 2:55 PM, Inspector Mitchell observed **TV-6** return to the
2 residence. An Asian male exited the driver's seat and an Asian female exited the
3 passenger seat.

4 120. Sergeant Paul told TFO Klokow that while contacting **Mai Ngoc HUYNH**
5 and **Minh NGO** during this traffic stop, he observed three large tubs in the back of the
6 minivan filled with a green leafy substance which he described as marijuana leaves and
7 buds, based on his training and experience.¹¹ Sergeant Paul has been a law enforcement
8 officer for 13 years and has extensive experience identifying and seizing marijuana, first
9 at the Washington State Basic Law Enforcement Academy and throughout his career.
10 Sergeant Paul's experience includes assisting with the search and dismantling of multiple
11 clandestine marijuana grow operations.

12 121. On September 20, 2018, King County Sheriff's Detectives and I were
13 conducting surveillance of **Mai Ngoc HUYNH** and **Minh NGO**. I initiated surveillance
14 at **Subject Residence 5** at approximately 9:30 AM and observed **TV-6** and **TV-7** parked
15 in the driveway of the residence. At approximately 10:00 AM, I followed **TV-6** from the
16 residence to a location in Renton. I observed that **Minh NGO** was driving and that an
17 Asian female was a passenger. I could not clearly see the Asian female's face to confirm
18 that the passenger was **Mai Ngoc HUYNH**. **Minh NGO** exited the vehicle and the
19 female remained in the passenger's seat. At approximately 12:15 PM, both passengers
20 were back in **TV-6** and departed. Investigators continued to follow **TV-6** to the same
21 Sammamish residence identified on August 2, 2018, **Subject Residence 6**. Detectives
22 Przygocki and Chivington conducted surveillance of the residence on foot and observed
23 that **TV-6** was parked around the back side of the residence with multiple other vehicles.
24 Detective Przygocki noted that all the doors and windows of the residence appeared to be
25 strategically covered, and that the yard appeared to be unkempt, both characteristics
26

27 _____
28 ¹¹ In one or more previous affidavit(s), I erroneously attributed this observation to Deputy
Sawtelle.

1 common at clandestine marijuana grow locations. Detective Przyocki stated that while on
2 foot, standing in the street at the chain link fence surrounding the residence, he detected
3 the odor of live, growing marijuana plants. Detective Chivington also noted that he
4 detected the odor of marijuana as he drove past the residence. Detectives Przyocki and
5 Chivington have extensive experience conducting narcotics investigations, in particular,
6 investigating clandestine marijuana grow operations. Based on their training and
7 experience searching and dismantling clandestine marijuana grows, Detectives Przyocki
8 and Chivington are able to tell the difference between the odor of marijuana and the odor
9 of growing marijuana plants.

10 122. Investigators have requested and reviewed power records from PSE
11 associated with **Subject Residence 6**, which, as of September 5, 2018, do not indicate
12 high usage. Records provided by PSE confirm that service was initiated at **Subject**
13 **Residence 6** on June 15, 2015 in the name of **Mai HUYNH**. I know through my training
14 and experience that it is common for many individuals operating clandestine marijuana
15 grows to re-wire residences to divert power and make usage appear normal or low in an
16 effort to evade law enforcement detection. Given the three large tubs of marijuana
17 observed in **TV-6** (after leaving **Subject Residence 6**) by Deputy Sawtelle on August 2,
18 2018, investigators believe it is also possible that the residence is being used or was
19 previously being used to dry, process or package marijuana obtained from other
20 locations, and is now being set up as a marijuana grow. Either scenario is consistent with
21 the appearance of the residence, the circumstances surrounding **TV-6's** visits to the
22 residence, the previously low power bill and the clear odor of marijuana emanating from
23 the secluded residence, detected by two experienced narcotics investigators. According
24 to data produced by the judicially authorized GPS tracking device affixed to **TV-6**, the
25 vehicle has since visited **Subject Residence 6** on numerous occasions, as recently as
26 October 8, 2018.

1 **V. AGENT'S SPECIALIZED KNOWLEDGE**

2 123. As a result of my training and experience, and my discussions with my law
3 enforcement colleagues, I know the manufacture and distribution of marijuana is
4 frequently, if not always, a continuing criminal enterprise taking place often over months
5 and years. Therefore, although the product, inventory and proceeds of a drug
6 manufacturing and trafficking organization is likely to fluctuate over time, records and
7 evidence associated with the manufacture and distribution of narcotics are frequently
8 maintained, intentionally or unintentionally, over long periods of time. Investigators are
9 seeking to search **THE SUBJECT PREMISES** for any and all evidence of narcotics
10 manufacturing, trafficking, and money laundering offenses, as described in Attachment
11 B. I am seeking to search all areas of **THE SUBJECT PREMISES**, as specified in
12 Attachments A.

13 124. I know the following from my training, my experience, and my discussions
14 with other investigators and analysts, about: the manufacture of marijuana in indoor,
15 clandestine grow operations in the Pacific Northwest; the transportation and distribution
16 of that marijuana inside and outside the State of Washington, including the use of the
17 mail and other shippers; the exchange of funds in payment for or in facilitation of these
18 crimes; and the laundering of proceeds earned from the crimes.

19 125. I know through my training and experience that the distribution of illegal
20 narcotics is frequently a continuing activity lasting over months and years. Persons
21 involved in the trafficking of illegal controlled substances typically will obtain and
22 distribute controlled substances on a regular basis, much as a distributor of a legal
23 commodity would purchase stock for sale. Similarly, such drug traffickers will maintain
24 an "inventory" which will fluctuate in size depending upon the demand for and the
25 available supply of the product. Drug traffickers keep records of their illegal activities
26 not only during the period of their drug trafficking violations but also for a period of time
27 extending beyond the time during which the trafficker actually possesses/controls illegal
28

1 controlled substances. The records are kept in order to maintain contact with criminal
2 associates for future transactions and so that the trafficker can have records of prior
3 transactions for which the trafficker might still be owed money or might owe someone
4 else money. In addition to documenting inventory, debts and profits, drug traffickers also
5 often document assets, employees, invoices, customer lists, shipping records, bills, bank
6 records including statements, checks, deposit slips, account information, loan documents,
7 address books, photos and other records which allow them to keep track of illegitimate
8 drug proceeds, expenditures and assets. Drug traffickers often keep these records in their
9 homes and in vehicles that they own, use, or have access to. I am seeking to seize these
10 items should they be found.

11 126. I also know through my training and experience that it is common for drug
12 traffickers to conceal large quantities of currency, foreign currency, financial instruments,
13 precious metals, jewelry, and other items of value which are proceeds from drug
14 trafficking in their residences. I know through my training and experience that drug
15 traffickers often hide currency and items of monetary value in surreptitious locations,
16 such as mattresses, inner walls, safes, basements, attics, and secret compartments.
17 Evidence of excessive wealth beyond an individual's outward means is probative
18 evidence of the distribution of controlled substances. Therefore, receipts showing the
19 expenditure of large sums of money and/or the expensive assets are evidence of drug
20 trafficking. Drug traffickers commonly keep the expensive assets themselves and/or
21 documentation of the purchase of the asset (receipts, warranty cards, etc.) in their homes,
22 places of business, on their persons or in carried cases and purses, and in vehicles that
23 they own, use, or have access to. I am seeking to seize these items.

24 127. I know through my training and experience that manufacturing and
25 distributing marijuana is an economic crime aimed at financial benefit. I also know that
26 individuals engaged in drug trafficking attempt to conceal and/or launder these funds in a
27 number of ways including using straw purchasers and quit-claims to conceal property
28 ownership, depositing funds in bank accounts associated with fictitious or inoperable

1 businesses or LLCs, the purchase and negotiation of various money orders, which are
2 easier to conceal within the U.S. Mails and more difficult for law enforcement to track,
3 excessive and/or frequent gambling with large cash payouts designed to appear as casino
4 winnings, as well as structured payments and out of state deposits and withdrawals. Any
5 financial, sales, business and employment records, tax records, bank statements, receipts,
6 checkbooks, credit card statements, accounting statements, insurance documents, import
7 and export documents, shipping records and the like, which show financial information
8 and transactions such as sources of funds, expenditures, investments and/or application of
9 funds could be important evidence of marijuana manufacture, distribution and money
10 laundering. I have learned that one method of showing financial gain and money
11 laundering is to compare known sources of legitimate funds in a given time period to the
12 application of funds for the same time period. The excess of the application of funds to
13 the known sources of legitimate funds have likely come from the unlawful activity, in
14 this case the cultivation and transportation and re-distribution of marijuana, including via
15 the U.S. Mail and other shipping methods. I am aware that these records are often stored
16 at a person's residence or vehicle, or on the person or in carried cases, at times away from
17 the growing marijuana operation or other criminal activity, where they are secure, but
18 still easily acceptable. Therefore, I am seeking to seize, photograph and/or otherwise
19 document such records should they be found. I also request authorization to search for
20 these records in any such form or documents including printed, written, handwritten,
21 faxed or typed, photocopies, original documents, and other photographic format.

22 128. It is common for individuals engaged in manufacturing marijuana to use a
23 variety of equipment including, but not limited to specialized lighting, transformers to re-
24 route power, electrical equipment, nutrients, chemicals, fertilizers, ballasts, reflective
25 hoods, pots, soil, fans, pumps, ventilation and piping materials, pruning equipment, vents,
26 filters and other items needed for the manufacture of marijuana.

27 129. I also know through my training and experience that individuals engaged in
28 shipping or otherwise transporting marijuana out of the state of Washington often

1 maintain an inventory of supplies used for concealing and packaging marijuana (*i.e.*,
2 scales, packaging, plastic and/or static shield bags, cardboard boxes, heat sealing devices,
3 masking agents) on hand over a lengthy period of time, even when they do not have any
4 controlled substances on hand. The aforementioned items are frequently maintained in
5 the dealer's homes and/or in vehicles that they own, use, or have access to. Drug
6 traffickers also often have some amount of inventory -- namely, illegal drugs -- stored in
7 their homes and/or in vehicles that they own, use, or have access to. I am seeking to
8 seize, photograph or otherwise document the existence of all these items should they be
9 found.

10 130. It is common for drug traffickers to possess firearms and ammunition to
11 protect their drugs, assets, and persons from, rival traffickers, other criminals, and from
12 law enforcement. Persons who purchase and possess firearms also tend to maintain the
13 firearms and ammunition for lengthy periods of time. Firearms can be acquired both
14 legally and unlawfully, without official/traceable documentation. Persons who acquire
15 firearms from Federal Firearms Licensees, through deliberate fraud and concealment,
16 often will also acquire firearms from private parties and other sources unknown to ATF.
17 Persons who, whether legally or illegally, purchase, possess, sell and/or transfer firearms
18 or ammunition commonly maintain the firearms or ammunition on their person, at their
19 residence or business, or in a motor vehicle which they own and/or operate. Firearms or
20 ammunition are often secreted at other locations within their residential curtilage, and the
21 identification of these firearms will assist in establishing their origin. Persons who
22 purchase, possess, sell and/or trade firearms or ammunition commonly maintain
23 documents and items that are related to the purchase, ownership, possession, sale and/or
24 transfer of firearms, ammunition, and/or firearm parts, including but not limited to
25 driver's licenses, telephone records, telephone bills, address and telephone books,
26 canceled checks, receipts, bank records and other financial documentation on the owner's
27 person, at the owner's residence or business, or in vehicles that they own, use, or have
28 access to. Additionally, these individuals often maintain holsters, spare magazines or

1 speed loaders and other instruments to facilitate the use of firearms in furtherance of
2 criminal activity or acts of violence.

3 131. It is common for members of drug trafficking organizations, in an attempt
4 to disguise their identities and illegal activities, to use prepaid cellular telephones and
5 prepaid long distance calling cards. Often the only way to connect a subject with a
6 particular prepaid cellular telephone or calling card is to seize the phone or calling card
7 from the trafficker or his residence. The aforementioned items are frequently maintained
8 in the drug trafficker's residence, place of business, or other areas they have access to.
9 Drug traffickers regularly use cell phones, Blackberries, and other electronic
10 communication devices to further their illegal activities. As a result, evidence of drug
11 dealing can often be found in text messages, address books, call logs, photographs,
12 emails, text messaging or picture messaging applications, videos, and other data that is
13 stored on cell phones, iPads, Blackberries, and other electronic communication devices.
14 Additionally, the storage capacity of such devices allows them to be used for the
15 electronic maintenance of ledgers, pay/owe logs, drug weights and amounts, customers
16 contact information, not only during the period of their drug trafficking violations but
17 also for a period of time extending beyond the time during which the trafficker actually
18 possesses/controls illegal controlled substances. The records are kept in order to
19 maintain contact with criminal associates for future transactions and so that the trafficker
20 can have records of prior transactions for which the trafficker might still be owed money
21 or might owe someone else money.

22 132. As previously stated, I am aware through my training and experience that
23 individuals engaged in narcotics trafficking frequently use cell phones, iPads,
24 Blackberries and other communication devices as an easy way to document, store and
25 share information related to their criminal activities with co-conspirators. This includes
26 using the phones to take and store photographs of items associated with the criminal
27 activity. For example, as previously described, in August 2016, **Hoan Thai TRAN**'s cell
28 phone was found to contain photos of marijuana plants and other unknown substances,

1 multiple marijuana grow schedules and instructions, parcel tracking numbers, banking
2 information, and photos of identification belonging to other individuals and recently
3 mailed parcels. In June 2018, Kiet TRAN's cell phones were found to contain photos of
4 financial documents including blank checks associated with, among others, "Hoan
5 TRAN, 7433 48th Ave. S., Seattle, WA 98118" (**Hoan Thai TRAN**'s residence prior to
6 moving to **Subject Residence 1**). Therefore, I am seeking to search **THE SUBJECT**
7 **PREMISES** for cell phones, iPads, Blackberries and other communication devices, and
8 to conduct a limited search of those items as specified in Attachment B for evidence of
9 narcotics trafficking and money laundering, including the stored photographs within
10 those phones.

11 133. Drug traffickers often store many of the items described above where they
12 are convenient and safe, such as in their homes, in their vehicles, and/or carry the items
13 on their person or in purses, briefcases, backpacks or other carried containers. In
14 particular, drug traffickers may carry with them drugs, drug proceeds, ledgers, firearms,
15 cellular phones, shipping paperwork, receipts, invoices, currency, and other smaller-sized
16 items that are needed close by on a regular basis. Therefore I am seeking to search the
17 following persons, and carried cases, to seize these types of items should they be found:
18 **Hoan Thai TRAN, Dung Ngoc LU, Truc TRAN, Hong BUI, Thanh Thao Chi**
19 **THANH, Anh Nguyen TRAN, Dai Thanh TRAN, Wilson TRUONG, Zhiyu LIU,**
20 **Huy HA, Nghi Phuong CHAU, Mai Ngoc HUYNH and Minh NGO.**

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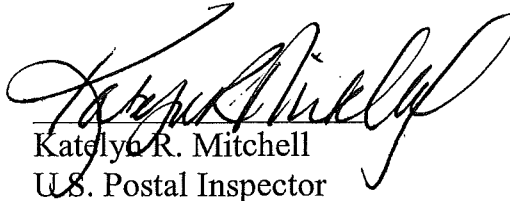
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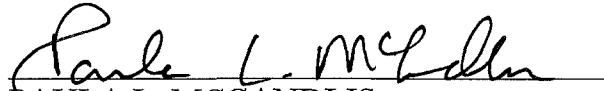
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VI. CONCLUSION

134. Based on the facts set forth in this affidavit, I believe that **THE SUBJECT PREMISES** have been, are being, and continue to be used by **Hoan Thai TRAN, Dung Ngoc LU, Truc TRAN, Hong BUI, Thanh Thao Chi THANH, Anh Nguyen TRAN, Dai Thanh TRAN, Wilson TRUONG, Zhiyu LIU, Huy HA, Nghi Phuong CHAU, Mai Ngoc HUYNH, Minh NGO** and their associates, some of whom are described above, to conduct illicit activities including distribution and manufacturing of controlled substances, in violation of 21 U.S.C. § 841(a)(1), unlawful use of a communication facility, including USPS and UPS, to facilitate the distribution of controlled substances, in violation of 21 U.S.C. § 843(b), conspiracy to commit these offenses in violation of 21 U.S.C. § 846, and money laundering, in violation of 18 U.S.C. § 1956, and related offenses. I further believe that there is probable cause to conclude that the items described in Attachment B will be found in the **SUBJECT PREMISES** and on the persons and in carried cases of **Hoan Thai TRAN, Dung Ngoc LU, Truc TRAN, Hong BUI, Thanh Thao Chi THANH, Anh Nguyen TRAN, Dai Thanh TRAN, Wilson TRUONG, Zhiyu LIU, Huy HA, Nghi Phuong CHAU, Mai Ngoc HUYNH and Minh NGO** as specified in Attachments A.


Katelyn R. Mitchell
U.S. Postal Inspector

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit on the 9th day of October 2018.


PAULA L. MCCANDLIS
United States Magistrate Judge